

EXHIBIT “A”

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
4 PHILADELPHIA COUNTY
5 CASE NO. 19-04078-RBS

6 -----x
7 EVELYN CINTRON,

8 Plaintiff,

9 v.

10 CITY OF PHILADELPHIA, et al,

11 Defendants.
12 -----x

13 1717 Arch Street

14 Philadelphia, Pennsylvania

15 October 28, 2022

16 11:03 a.m.

17 VIDEOTAPED DEPOSITION of EVELYN
18 CINTRON, the Plaintiff, held at the
19 above-entitled time and place, taken before
20 Carolyn Crescio, a Professional Shorthand
21 Reporter and Notary Public of the State of
22 Pennsylvania.

23 * * *

A P P E A R A N C E S:

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CITY OF PHILADELPHIA LAW DEPARTMENT

Attorneys for Defendant City of Philadelphia and

Joseph Sullivan

1515 Arch Street

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Philadelphia, Pennsylvania 19102

BY: SHARON ULAK, ESQ.

ALSO PRESENT:

DENZEL SINCLAIR, Videographer

CANDACE HARDY, Esq.

1
2 THE VIDEOGRAPHER: All right. We
3 are now on the record. My name is
4 Denzel Sinclair. I'm the
5 videographer retained by -- on the
6 record.

7 This is a video deposition
8 through the United States District
9 Court of the Eastern District of
10 Pennsylvania.

11 Today's date is October 28, 2022.
12 The time is 10:59 a.m.

13 This deposition is being held at
14 1717 Arch Street, Philadelphia, PA,
15 in the matter of Evelyn Cintron
16 versus the City of Philadelphia, et
17 al. The deponent is Evelyn Cintron.

18 Will all counsel please identify
19 themselves for the record.

20 MR. GOLDEN: My name is Kevin
21 Golden of O'Hagan Meyer. I'm joined
22 by my colleague, Candace Hardy. We
23 represent the defendant, Police
24 Athletic League.

25 MS. ULAK: Sharon Ulak on behalf

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E. CINTRON

of the City of Philadelphia and
Joseph Sullivan.

MR. GREEN: Isaac Green on behalf
of plaintiff, Evelyn Cintron.

THE VIDEOGRAPHER: The court
reporter, Carolyn Crescio, will now
swear the witness.

E V E L Y N C I N T R O N, the witness herein,
after having been first duly sworn by a Notary
Public of the State of Pennsylvania, was examined
and testified as follows:

BY THE COURT REPORTER:

Q. Please state your name for the
record.

A. Evelyn Cintron.

EXAMINATION

BY MR. GOLDEN:

Q. Good morning, Ms. Cintron.

A. Good morning.

Q. My name is Kevin Golden. We met off
the record a couple minutes ago. Can I ask,
have you ever been deposed before, a situation
like this, a deposition?

1 E. CINTRON

2 A. Yes.

3 Q. Okay. Approximately how long ago
4 were you last deposed?

5 A. I don't recall.

6 MR. GREEN: Excuse me, Kevin, I
7 don't mean to interrupt. I just
8 want to just, at least for purposes
9 of the record, reserve my client's
10 right to read and sign.

11 Q. Ms. Cintron, what I would like to do
12 is, before we get started, go over some ground
13 rules that will hopefully make today's
14 deposition move a little bit more smoothly, and
15 make sure that we kind of understand each other
16 as we work through the day.

17 To your left you'll see the court
18 reporter. She will be taking down everything
19 that I am saying and everything that you are
20 saying, so I'm going to do my very best not to
21 interrupt you when you are giving me an answer.
22 And I would ask that, at the same time, if I'm
23 in the question, you allow me to finish the
24 question. You may sometimes know where I'm
25 going with the question. You may know exactly

1 E. CINTRON

2 what I want to ask, but in order to prevent us
3 from talking over each other, which makes the
4 court reporter's job more difficult, I would
5 like to -- I'm going to do my best to make sure
6 I don't interrupt you, and hopefully we can work
7 that way, we are not talking over each other,
8 okay?

9 A. Okay.

10 Q. If I ask you any questions that you
11 do not understand, if I've used a term, or the
12 question itself you don't understand it, please
13 just let me know. I'll do my best to rephrase
14 and reask it in a way that is more clear for
15 you. Does that make sense?

16 A. Yes.

17 Q. I don't want you to have to guess.
18 So if I ask you a question and you don't know
19 the answer, it's quite fine to say, I don't
20 know. If you feel that it would help to say,
21 Well, I don't know whether it was between X and
22 Y, with an approximation, that's fine. I only
23 want to ask -- I only want to know from you the
24 things you actually know.

25 If we get to a point where you need to

1 E. CINTRON

2 take a break, that's quite fine. Just let me
3 know, and we will work with you to take that
4 break, for whatever reason. I don't need to
5 know what that reason is. The only question I
6 would -- pardon me, the only reservation I would
7 make is that if I have a question that I've
8 asked, that we allow you to answer that question
9 before we take the break. Is that okay for you?

10 A. Yes.

11 Q. And the last, I guess, ground rule,
12 I would say, is because the court reporter is
13 transcribing all of our exchanges, I'd ask that
14 everything that you say -- and I'll do the best
15 from my end -- is to make sure all of your
16 responses are verbal. If you sometimes shake
17 your head or nod, that's general -- I mean,
18 people normally communicate that way, but it's
19 harder to reflect it on the record. So at some
20 point I may need to say to you, Oh, is that a
21 "yes" or is that a "no"? But just generally
22 speaking, if you could try, make sure all your
23 responses are verbal. Is that okay?

24 A. Yes.

25 Q. All right. Ms. Cintron, can you

1 E. CINTRON

2 tell me, are you today currently employed?

3 A. No.

4 Q. Working backwards, what was the last
5 job that you held?

6 A. I recently worked a few months at
7 Sephora as a beauty adviser.

8 Q. You know what, let me step back with
9 another question.

10 Do you currently reside in the state of
11 Pennsylvania?

12 A. No.

13 Q. Which state do you reside in?

14 A. Georgia.

15 Q. And how long have you been in
16 Georgia?

17 A. I've been there since 2017, 2018,
18 when I left the job.

19 Q. And when you say, "left the job," do
20 you mean with the City of Philadelphia?

21 A. Yes.

22 Q. The position that you held with
23 Sephora, do you know approximately how long you
24 held that?

25 A. I think it was just four months.

1 E. CINTRON

2 Q. And was that in 2022 or 2021, if you
3 recall?

4 A. 2022.

5 Q. And what was -- did you hold a
6 position -- any jobs before working in Sephora?

7 A. I worked for Off Duty Management.

8 Q. And do you recall --

9 A. That was approximately 2020.

10 Q. And do you know how long you held
11 that job?

12 A. Six months, approximately.

13 Q. Was the position with Sephora, was
14 that an hourly or salary position?

15 A. Hourly.

16 Q. And do you recall what that hourly
17 rate was?

18 A. Seventeen dollars an hour.

19 Q. Did you have a set schedule or could
20 it change from week to week?

21 A. It fluctuated.

22 Q. And the job with Off Duty
23 Management, was that an hourly or a salary?

24 A. It was salary.

25 MR. GOLDEN: Let's do PAL-1.

1 E. CINTRON

2 (Off Duty Management letter is
3 received and marked as Exhibit PAL-1
4 for identification, as of this
5 date.)

6 Q. Ms. Cintron, just so you know, I'm
7 going to have the court reporter put a label on
8 it, and then she will allow you to look at it.

9 A. Okay.

10 Q. You can familiarize yourself with
11 it.

12 Ms. Cintron, is this -- is this a -- let
13 me step back. This is a record we obtained from
14 Off Duty. Does this appear to be the offer
15 letter that extended you the employment with Off
16 Duty?

17 A. It appears to be, yes.

18 Q. And does the start date of
19 August 19, 2019, is that approximately when you
20 began working with Off Duty?

21 A. Yes.

22 Q. And this says there was a salary, a
23 base salary of 66,000. Is that accurate?

24 A. Yes.

25 Q. When you held this position, was

1 E. CINTRON

2 there any other pay that you received, like
3 overtime, bonuses, anything apart from the base
4 salary?

5 A. I was supposed to receive bonuses,
6 but they never paid me for my bonuses.

7 Q. And this -- the position was a
8 business-development manager; is that correct?

9 A. They manage overtime hours for
10 police departments throughout country.

11 Q. And just so I'm clear, was your
12 title the business-development manager?

13 A. Yes.

14 Q. And, generally, can you tell me what
15 the -- what that position entailed?

16 A. Greg Doran recruited me from
17 LinkedIn. And my job was to basically secure
18 accounts for -- from the different police
19 departments for the company.

20 Q. And so when you say to get those
21 accounts, I think, if I understand you
22 correctly, it would be accounts where you would
23 manage those police departments' overtime?

24 A. I wouldn't manage the overtime. The
25 company would.

1 E. CINTRON

2 Q. Okay. So the company would do that.
3 Your position was to work to obtain other
4 clients; is that correct?

5 A. Yes. And they would feed us the
6 clients to work with.

7 Q. Was there -- apart from the Sephora
8 and Off Duty Management positions, have you held
9 any other jobs since the end of your employment
10 with the City of Philadelphia?

11 A. No. When I left Off Duty
12 Management, I was in good standing, and I had
13 over \$30,000 in compensation that they owed me.
14 And when we went to the Chief of Police
15 Association Conference, my boss, Greg Doran,
16 spoke to Deputy Commissioner Coulter. And after
17 being given a great review of how I was doing
18 with this company, a few days later I was
19 terminated.

20 Q. That -- you mentioned -- what was
21 the name of that conference you were attending?

22 A. It was the Chief of Police
23 Conference. And while I was in -- I forgot what
24 state I was in with one of my coworkers, Greg
25 Doran attended the Chief of Police Conference, I

1 E. CINTRON

2 believe here in Philadelphia, where he met
3 Deputy Commissioner Coulter and had a
4 conversation with him about me. And the next
5 thing you know, that Monday, I was told that
6 they no longer needed me.

7 Q. And so Mr. Doran -- so your
8 employment at that time was terminated by Off
9 Duty?

10 A. Well, basically, they told me they
11 didn't need me no more, and they claimed it was
12 because of my performance, on that Monday. But
13 that Friday they had -- we had a meeting, and I
14 was given praise about how well I was doing --
15 until he had a conversation with Deputy
16 Commissioner Coulter of the Philadelphia Police
17 Department.

18 Q. And so that conference, would it
19 have occurred in 2020?

20 A. I believe so.

21 Q. And it was here in Philadelphia?

22 A. I believe this is where he spoke to
23 her, yes.

24 Q. And that's Deputy Commissioner
25 Coulter, correct?

1 E. CINTRON

2 A. Yes.

3 Q. What did -- did Deputy Commissioner
4 Coulter tell you about that conversation?

5 A. No. My coworker, Jeff.

6 Q. What is Jeff's last name?

7 A. I don't recall.

8 Q. He's an employee of Off Duty?

9 A. Yes.

10 Q. And can you tell me what you
11 remember Jeff told you about that conversation?

12 A. He stated that while our boss, Greg
13 Doran, was at the conference, he met my previous
14 boss, Deputy Commissioner Coulter, and that he
15 had a conversation with her about me. And he --
16 and that Greg Doran had told him that. And he
17 basically was telling me, Prepare, because I
18 don't know what that's all about.

19 Q. Did he tell -- did Jeff tell you --
20 I just want to try to be clear -- did Jeff tell
21 you what Greg told Deputy Commissioner Coulter?

22 A. No. He was just basically giving me
23 a heads-up, and it wasn't good because -- based
24 on his conversation with Greg.

25 Q. So this was a conversation, as Jeff

1 E. CINTRON

2 related to you, that he either participated in
3 or overheard between Mr. Doran and Deputy
4 Commissioner Coulter?

5 A. No. This is a conversation that
6 Greg Doran had with Jeff over the phone, while
7 we were at a different location at a different
8 conference.

9 Q. So if I understand it correctly,
10 Greg called Jeff and relayed the conversation he
11 had with Deputy Commissioner Coulter?

12 A. Yes.

13 Q. And then Jeff called you and said,
14 Heads-up, doesn't sound like that was a good
15 conversation?

16 A. No. When we were at the conference
17 we had to be there several days. And,
18 apparently, Jeff spoke to Greg Doran the night
19 before. So when we got together in the morning
20 to go to our next location, he explained to me
21 that he had received a call from Greg Doran, and
22 that Greg Doran had told him that he had spoken
23 to Deputy -- that he had met and spoken to
24 Deputy Commissioner Coulter at this event. And
25 that they had a conversation about me. But he

1 E. CINTRON

2 did not relay what was the content -- context of
3 that conversation.

4 Q. And so he didn't relay the contents
5 of the conversation between Greg and Deputy
6 Commissioner Coulter, correct?

7 A. Yes. He just told me -- giving me
8 the heads-up, Prepare, because it doesn't sound
9 good.

10 Q. Do you recall the conference you
11 were attending, the name of what that conference
12 was?

13 A. It was -- basically, they had, like,
14 different conferences about, you know,
15 equipment, police equipment, and they would send
16 us to get leads from those places. I can't
17 recall exactly where I was at. I believe it
18 might have been -- I don't remember. We went to
19 so many places, I can't recall which one I was
20 at, at that time.

21 Q. So -- and then can you tell me how
22 your employment -- what happened next? Did Greg
23 call you? Like, how did your employment with
24 Off Duty terminate?

25 A. Well, Friday, prior to that Monday

1 E. CINTRON

2 where I received the call that I was no longer
3 needed, we had a conference call where Greg
4 would talk to everyone on the line about
5 everyone's achievements and celebrate the
6 achievement. And that Friday, he gave me my
7 props about how great I was doing, how many
8 accounts I had secured. And he even mentioned
9 the bonus that I would receive. And that
10 Monday, to my surprise, he called and told me
11 that I was no longer needed, and said the
12 opposite of what he had said Friday, which was
13 my performance, which was not true.

14 Q. In that call on Friday, did he
15 explain to you what the amount of that bonus
16 would be?

17 A. I was expecting at least \$33,000.

18 Q. So Off Duty, there was the base
19 salary, bonus eligibility. Any other, like,
20 401(k) or profit-sharing plans that you were
21 entitled to?

22 A. No.

23 Q. Did the company provide any kind of
24 health or dental insurance?

25 A. No. I believe they do, but because

1 E. CINTRON

2 I was a new employee, I wasn't qualified for it
3 at the time.

4 Q. So was it, in your understanding,
5 like a probationary term?

6 A. Yes.

7 Q. Okay. Do you currently have health
8 or dental insurance?

9 A. I have health and dental insurance
10 for another two years through the city. They
11 extend health care and dental care for five
12 years after you leave the job.

13 Q. Let me back up. The position with
14 Sephora, can you tell me how that ended?

15 A. I had to resign due to medical
16 reasons.

17 MS. ULAK: I'm sorry. What was
18 the last word?

19 THE WITNESS: Medical reasons.

20 MS. ULAK: Oh, okay. Thank you.

21 Q. And trying to be respectful of that
22 line of inquiry, are those medical reasons -- do
23 they currently prevent you from working?

24 A. Yes.

25 Q. May I ask, what is that condition?

1 E. CINTRON

2 A. Well, I have PTSD due to job-related
3 stress. And I get anxiety. I can't sleep at
4 night so it prevents me from properly
5 functioning sometimes at work. And I was
6 getting headaches because of my thyroid
7 condition.

8 Q. Ms. Cintron, are you currently
9 treating with any doctors or therapists for the
10 PTSD?

11 A. Yes. I just switched to a new
12 doctor. Russell Medical Group in Georgia. And
13 they are treating me for my PTSD, anxiety, and
14 related, you know, medical issues.

15 Q. Prior to Russell Medical Group -- do
16 you know approximately when you started treating
17 with that entity?

18 A. A few months ago. I believe, like,
19 three or four months ago, I switched.

20 Q. And was there -- let me back up.

21 Apart from Russell Medical Group, is there
22 anyone else that you're currently treating with
23 as it relates to your PTSD or anxiety?

24 A. No, because everyone that I was
25 treating with prior to going to this new doctor

1 E. CINTRON

2 was here in Philadelphia.

3 MR. GREEN: Excuse me. Can we go
4 off the record for one second?

5 MR. GOLDEN: Sure.

6 THE VIDEOGRAPHER: The time is
7 11:19. We are now off the record.

8 (A break was taken.)

9 THE VIDEOGRAPHER: The time is
10 11:20. We are now on the record.

11 Q. Prior to Russell Medical Group, can
12 you tell me the name of the doctors or
13 therapists that you were treating with as it
14 relates to your PTSD and anxiety?

15 A. Yes. When I first started getting
16 the symptoms, I told my doctor at Holmesburg
17 Medical, Dr. Carter. And based on my symptoms
18 and complaints that I was having, he told me
19 that he thought I had anxiety or depression.
20 And he referred me to the proper doctor to --
21 for proper diagnosis.

22 Q. And what was the name of the doctor
23 to whom he referred you?

24 A. He referred me to Philmont Guidance
25 Center. While there, I received counseling from

1 E. CINTRON

2 Ms. Whitley, I believe her name is, and I saw
3 the nurse practitioner, Aurn. I believe it's
4 A-U-R-N.

5 Q. Apart -- so let me kind of back up.
6 I want to be clear in the questions I'm asking
7 you.

8 Holmesburg Medical, you said that was the
9 entity that first diagnosed you with the PTSD
10 and the anxiety?

11 A. No. They didn't diagnose me. He
12 referred me based on my medical conditions.

13 Q. And so Dr. Carter referred you to
14 Philmont Guidance, and is that the entity that
15 diagnosed your condition?

16 A. Yes.

17 Q. Did you -- is there anyone else
18 besides Philmont Guidance that has provided
19 treatment for those conditions?

20 A. When I went to Georgia, I started
21 seeing Dr. Remalia, and he was my primary care.
22 And he just continued my medical treatment in
23 terms of my PTSD and medication management.

24 Q. And do you know, is Dr. Remalia
25 associated with a practice with the name of an

1 E. CINTRON

2 entity?

3 A. I believe it's Remalia Medical
4 Group, or Highlands -- Highlands Medical Group.
5 That's what it's called.

6 Q. So Holmesburg Medical, Philmont
7 Guidance, Dr. Remalia. Are there any other
8 providers with whom you treated to seek care for
9 your anxiety or depression?

10 A. And recently my new doctor.

11 Q. The --

12 A. At Russell Medical.

13 Q. Right.

14 Can you tell me the -- when you were --
15 let me back up. I'm sorry.

16 Apart from the anxiety and the depression,
17 are there any other conditions that currently
18 prevent you from working?

19 Oh, I'm sorry. I was wrong. I said
20 "anxiety and depression." So it's anxiety and
21 PTSD, correct? Is there any other conditions
22 that prevent from you working?

23 A. Severe depression, anxiety, PTSD.
24 And I was recently diagnosed with having two
25 small tumors, one in my pituitary, and one

1 E. CINTRON

2 behind my left eye, which were causing me
3 headaches.

4 Q. And so is -- Russell Medical Group,
5 are they the only entity treating you currently
6 for the anxiety, depression, and PTSD?

7 A. Yes. And I'm supposed to be
8 scheduling, and since I just started with them,
9 I'm supposed to be scheduling to see a
10 psychiatrist and continue my counseling, but it
11 hasn't been set up yet.

12 Q. And forgive me, I just want to make
13 sure I'm clear. Apart from Holmesburg -- I'm
14 sorry, Russell Medical Group, are there any
15 other -- any other counselors or psychiatrists
16 besides Philmont Guidance or Dr. Remalia that
17 you have sought treatment with?

18 A. No.

19 Q. And are you -- can you identify the
20 medications that you're currently taking for the
21 conditions that you have?

22 A. I am taking paroxetine for my PTSD.
23 I am taking trazodone for insomnia. And I just
24 take my regular medication for my thyroid. I
25 can't remember the name of it.

1 E. CINTRON

2 Q. So it's the thyroid medication and
3 then paroxetan [sic]?

4 A. Paroxetan, I believe, or paroxetine,
5 or something like that.

6 Q. I'll Google --

7 A. I don't know the correct --

8 Q. I'll Google it later.

9 And then the trazodone, something like
10 that, for insomnia?

11 A. Yeah. To help me sleep at night.

12 Q. So the -- so just so I can back up
13 then, so you left the position with Sephora in
14 light of your medical conditions, correct?

15 A. Yes. Because I wasn't getting a lot
16 of sleep at night, and just not able to
17 function.

18 Q. Did any of the doctors that you are
19 treating with, or any of the entities we have
20 talked about, have they provided you any records
21 that state that you should take time off, or you
22 can't work, anything like that, to apply --
23 well, sorry, I don't want to be compound.

24 Did they give you any documentation saying
25 that you could not work?

1 E. CINTRON

2 A. I don't know what Ms. -- the nurse
3 practitioner from Philmont Guidance put in her
4 records, but she recommended that I do not
5 return back to work to the Philadelphia Police
6 Department, and take a medical leave of absence.

7 Q. And do you know -- do you know
8 approximately when that note was provided?

9 A. That was in 2017, I believe it was,
10 2017, '18.

11 Q. Have you -- in light of your
12 inability to work, have you applied for any kind
13 of Social Security Disability or other
14 disability payments?

15 A. I just recently applied for Medicare
16 to get medical because I know my medical is
17 about to expire, but I have not gotten an answer
18 yet.

19 Q. And so -- but apart from the
20 Medicare application, have you applied for any
21 form of disability payments or income
22 replacement?

23 A. No.

24 Q. Prior to working at Off Duty, you
25 were employed with the City of Philadelphia; is

1 E. CINTRON

2 that correct?

3 A. Yes.

4 Q. And can you tell me -- I know you
5 held several positions, and we will work through
6 that. Can you tell me when you started working
7 with the City of Philadelphia?

8 A. I began working for the City
9 of Philadelphia in 1999, going into 2000.

10 Q. And what was the title that you held
11 at that time, if you remember?

12 A. I worked for the City
13 of Philadelphia prison system. And I was a
14 correctional officer.

15 Q. And what is the position you held
16 next?

17 A. I then moved -- after working there
18 for seven years, I became a Philadelphia police
19 officer.

20 Q. And did you have -- and forgive me,
21 I'm not versed in this -- what was -- did you
22 have a rank when you became a police officer?

23 A. Initially, I was a police officer.
24 I then took the corporal's exam and became a
25 corporal. I then took the sergeant's exam and

1 E. CINTRON

2 became a sergeant. I then took the lieutenant's
3 exam and became a lieutenant.

4 Q. So how long -- approximately. Don't
5 worry if you -- this is -- one of the ground
6 rules I skipped in the beginning is, this isn't
7 a memory test, so I said, you know, only tell me
8 what you know, but if I'm asking for things
9 going back, if you don't remember, that's quite
10 all right.

11 Do you know how long approximately you
12 held the title of police officer?

13 A. I believe it was like, six, seven
14 years.

15 Q. And do you know how long you held
16 the title of corporal?

17 A. Four years.

18 Q. How long did you hold the title of
19 sergeant?

20 A. Three years.

21 Q. And title of lieutenant?

22 A. For the remainder.

23 Q. Who -- let me ask this in an easier
24 way because there might be multiple names. As a
25 police officer, you -- did you have a certain --

1 E. CINTRON

2 did you report to a corporal? I guess let me
3 ask the question this way. I would like to find
4 out the reporting structure as you moved up.
5 And you may say, I reported to several
6 supervisors, but I would just -- for simplicity
7 sake, could you tell me, as a police officer, I
8 reported to a corporal -- or did you have a
9 designated supervisor?

10 So with that long-winded exposition [sic]
11 out of the way, can you tell me, as a police
12 officer, who did you report to?

13 A. As a police officer on patrol, you
14 report to your first-line supervisor, which is a
15 sergeant. However, the corporal is an
16 administrative position, so if they give you an
17 assignment, you also are supposed to follow
18 their orders, because they are a higher rank.

19 Q. So there is a chain of command in
20 the police force, correct?

21 A. Yes.

22 Q. All right. In the role as a police
23 officer -- withdraw that.

24 When you -- when you were elevated into
25 the role of a corporal, what was the chain of

1 E. CINTRON

2 command there? Who did you report to?

3 A. A lieutenant.

4 Q. And when you became a sergeant, who
5 were you reporting to?

6 A. The lieutenant. That's what you
7 just asked me?

8 Q. No. When you were the -- as -- when
9 you were in the corporal role, who was your --
10 who did you report to?

11 A. I reported to a sergeant. And
12 sometimes the corporal.

13 Q. And then when you were then promoted
14 to lieutenant, who did you report to?

15 A. Can you rephrase that? Because
16 you're confusing me.

17 Q. Sorry. So let me back up. Let's
18 make sure. I'm going to kind of go back over
19 what I think you and I both just explained, and
20 that way we can both make sure we are on the
21 same page.

22 When you were a police officer, your --
23 you were -- you were reporting to a sergeant?

24 A. First-line supervisor, which is a
25 sergeant.

1 E. CINTRON

2 Q. Okay. When you were elevated into a
3 corporal, you were then reporting to the
4 sergeant, correct? That was your first-line
5 supervisor?

6 A. No. I was reporting to the
7 lieutenant.

8 Q. And when you were elevated then into
9 the sergeant role, were you still reporting to
10 the lieutenant?

11 A. Yes.

12 Q. All right. Then when you were
13 elevated to the lieutenant, are you reporting to
14 the deputy commissioner?

15 A. When I was assigned to the district,
16 I reported to the captain. When I got appointed
17 to the position of the commanding officer of
18 PAL, I reported to the deputy commissioner.

19 Q. And when you say "PAL," just for the
20 purposes of the record, you're referring to the
21 Police Athletic League, correct?

22 A. Yes. But, in addition to that, when
23 I was appointed by Commissioner Ross to become
24 the commander of the Police Athletic League, he
25 told me that I reported to him, but to go to the

1 E. CINTRON

2 deputy commissioner for the day-to-day things,
3 you know, things that he doesn't need to be
4 bothered with.

5 Q. So what I would like to do,
6 Ms. Cintron, is just -- if I heard you
7 correctly, when you were elevated into the
8 lieutenant role, you essentially held two roles;
9 the first was when you were appointed, you said,
10 to the district?

11 A. Yes.

12 Q. Can you briefly describe what that
13 position entailed?

14 A. So when I first got promoted to
15 lieutenant, they assigned me to the 25th Police
16 District. I was reporting to Captain Cram. And
17 he selected me as the administrative lieutenant,
18 as well as being in charge of the five squad
19 officers, which consisted of narcotics team,
20 technical team, the administrative staff in the
21 operations room. I also worked on the streets
22 when needed. So I just held a lot of different
23 hats.

24 Q. In the role as lieutenant -- and so
25 what I want to do, just so we're clear, focusing

1 E. CINTRON

2 right now, my questions all relate to this
3 district position.

4 When you would get -- do you get paper
5 checks or do you get direct deposit?

6 A. Both. Either.

7 Q. And those paychecks, would they come
8 from -- would it say the City of Philadelphia or
9 the Philadelphia Police Department? What would
10 that say?

11 A. City of Philadelphia.

12 Q. And when you were in that role as
13 the -- for the district, did you have a
14 designated shift? I think traditionally there
15 are three shifts; is that correct?

16 A. Yes.

17 Q. And did you have a designated shift?

18 A. I worked Monday through Friday, 9 to
19 5, and I worked some afternoon initiatives from
20 time to time. And sometimes the captain would
21 switch my schedule as needed.

22 Q. And just so -- was it Cram you said
23 was the captain?

24 A. Yes.

25 Q. And was it Captain Cram then that

1 E. CINTRON

2 set your schedule?

3 A. Yes.

4 Q. And -- and was there anyone besides
5 Captain Cram that you reported to?

6 A. No.

7 Q. In your recollection, who was
8 responsible for elevating you into the
9 commanding officer of the PAL unit?

10 A. Commissioner Richard Ross.

11 Q. Did you have any conversations with
12 Commissioner Ross about your elevation to the
13 commanding officer of PAL?

14 A. Well, initially, I received a call
15 from his sergeant who informed me that
16 Commissioner Ross has selected me for the
17 position of the commanding officer of the
18 Philadelphia Police Athletic League.

19 Q. Do you remember the name of that
20 sergeant?

21 A. I can't recall his name.

22 Q. And is it fair to say that you
23 were -- you assumed the role of commanding
24 officer for PAL in or around June of 2016?

25 A. Yes.

1 E. CINTRON

2 Q. Do you know when the phone call with
3 this sergeant occurred?

4 A. About a week prior to being
5 reassigned to the Police Athletic League. He
6 told me to expect a call from Commissioner Ross
7 with further instructions that afternoon.

8 Q. Did you submit any application for
9 that role?

10 A. No.

11 Q. Did you have any role in making an
12 interest in that role known?

13 A. No.

14 Q. So it was something that
15 Commissioner Ross decided on his own?

16 A. He decided it based on his
17 recommendations from other deputies and other
18 supervisors that he spoke to. And when he
19 called me to give me further instructions about
20 my role as a commanding officer, he explained
21 that he had heard many great things about me and
22 my leadership ability and my ability to work
23 with the officers, and that's why he had
24 selected me for the role.

25 Q. Did he -- did he identify any of the

1 E. CINTRON

2 deputies or supervisors on whom he was relying?

3 A. Yes. It was Deputy Commissioner
4 Coulter and the other female deputy commissioner
5 who I had met at community events.

6 Q. Do you recall that individual's
7 name?

8 A. I can't recall her name.

9 Q. Apart from Commissioner Ross, do you
10 know if anyone else was involved in the decision
11 to appoint you as the commanding officer of PAL?

12 A. No.

13 Q. So, from your understanding, he was
14 the only person who made that decision?

15 A. Yes and no. If I could explain
16 that.

17 Q. Sure. Go ahead.

18 A. Commissioner Ross had me do an
19 informal interview with the PAL board. He
20 stated that it was his decision, but that
21 because we were working in a collaborative
22 effort with the PAL board, that I needed to meet
23 with the PAL board to do an informal interview.

24 When I arrived to this meeting, at the
25 meeting was Bernie Prazenica, Ron Rabena, Ted

1 E. CINTRON

2 Qualli, Maureen Rush, and a few other board
3 members. I can't recall the names, but it was
4 at least 15 people in that room. And they all
5 began to ask me questions.

6 Q. Do you recall where that meeting
7 occurred?

8 A. Downtown, down here somewhere. But
9 I can't recall. I believe it was like 17th and
10 Market.

11 Q. And can you tell me -- you mentioned
12 that you were asked some questions. Can you
13 tell me what, if anything specifically, you
14 remember you were asked during that meeting?

15 A. They asked me about my background in
16 terms of my positions, just like you -- you
17 asked. And they asked me about my community
18 involvement. They asked me what would I bring
19 to PAL. But, specifically, they were asking me
20 how I would handle disciplinary issues with the
21 police officers.

22 Q. And so as -- if I understand that
23 correctly, those police officers, they would
24 report to you as the commanding officer?

25 A. Yes.

1 E. CINTRON

2 Q. Do you recall when that meeting
3 occurred?

4 A. It was the same week that I was
5 assigned to PAL, because it all happened fairly
6 quickly. I think I received the call from the
7 sergeant on a Wednesday. And that same
8 Wednesday I spoke to Commissioner Ross. I went
9 to meet with the board the next day. And then
10 on Friday, I received another call from the
11 commissioner's office, informing me that I
12 report -- that I would report to PAL that
13 Monday.

14 Q. Did anyone from PAL, those -- the
15 individual -- well, let me back up.

16 Did any of the individuals on the board
17 there that day ever tell you that they had
18 approved your appointment as the commanding
19 officer?

20 A. They explained that -- they were
21 saying -- was that their approval was necessary
22 for me to be on PAL. They did explain that,
23 ultimately, it was Commissioner Ross's decision,
24 but that because we work collaboratively, that
25 they had a say in who goes to PAL.

1 E. CINTRON

2 Q. After you were appointed -- so you
3 were told that Friday, beginning Monday you're
4 going to be -- you'll be acting as the
5 commanding officer of PAL; is that correct?

6 A. Yes.

7 Q. After you were -- after that change,
8 did you continue to receive pay from the City
9 of Philadelphia?

10 A. Yes. The collaboration involves the
11 police department covering the pay for all
12 officers assigned to PAL.

13 Q. So just so I understand you
14 correctly, the paycheck you received, even
15 though you were working as the commanding
16 officer, still came from the City of
17 Philadelphia, correct?

18 A. Yes.

19 Q. Did you receive any paychecks or
20 income directly from PAL?

21 A. No.

22 Q. When you were serving in the
23 commanding officer role, did you continue to
24 receive your benefits through the city?

25 A. Yes.

1 E. CINTRON

2 Q. Did PAL pay for any of your
3 benefits?

4 A. No.

5 Q. Did PAL ever pay you any bonuses?

6 A. No.

7 Q. But if I understood you correctly
8 then, also the officers who were assigned to the
9 PAL unit, they were also -- they were also paid
10 by the city; is that correct?

11 A. Yes. But there was an incident
12 where PAL was paying the officers \$25 to cover
13 some city events, which became an issue, because
14 I informed them that the officers have to get
15 paid through the city.

16 Q. And why is it they have to be paid
17 through the city?

18 A. Because they are considered
19 employees of the City of Philadelphia, and they
20 have to get paid their -- at the rate that they
21 are supposed to get paid.

22 Q. Pursuant to their rank?

23 A. Yes.

24 Q. I'd like to back up and make sure I
25 understood something you had said earlier,

1 E. CINTRON

2 correctly.

3 After you became -- is it -- Ms. Cintron,
4 forgive me, because I'll try to make us move a
5 little quicker. If I say, going forward,
6 "commanding officer," as it relates to your
7 title or your role, is it fair for -- what I
8 would like to do is say -- if I refer to your
9 position as commanding officer, I intend that to
10 mean the commanding officer of the PAL unit. Is
11 that okay with you? That way I don't have to
12 say every time, "as the commanding officer of
13 the PAL unit," if I just say -- so is it
14 acceptable to you for me to simply say, "as the
15 commanding officer," will you understand that I
16 mean, as the PAL unit?

17 A. Yes.

18 Q. Thank you.

19 You -- in the role of the commanding
20 officer, you said that you would report to both
21 Commissioner Ross, and then for the deputy
22 commissioner for day-to-day activities; is that
23 correct?

24 A. That -- those were the instructions
25 that Commissioner Ross gave me when he assigned

1 E. CINTRON

2 me to PAL.

3 Q. And who was the -- at the time, who
4 was the Deputy Commissioner to whom you would
5 report?

6 A. Deputy Commissioner Myron Patterson.

7 Q. And Deputy Commissioner Patterson is
8 a police officer?

9 A. He was the first deputy right under
10 Ross.

11 Q. And so, forgive me, but even though
12 he's the deputy commissioner, he's technically
13 still a police officer, correct?

14 A. Yes.

15 Q. And so he's an employee of the city?

16 A. Yes.

17 Q. And Commissioner Ross is also an
18 employee of the city?

19 A. Yes.

20 Q. When you took over as the commanding
21 officer, did you have a set shift or schedule
22 that you adhered to?

23 A. It's difficult to have a set
24 schedule at PAL because, even though my hours
25 were from eight to four, a lot of the events

1 E. CINTRON

2 happened after-hours or on weekends. So, even
3 though I was getting paid work eight to four, I
4 was not getting paid to work those extra hours.

5 Q. So that --

6 A. Most times.

7 Q. Were there times you were paid for
8 those events?

9 A. There was a few events that I
10 submitted overtime requests, and it was granted
11 by Deputy Commissioner Patterson.

12 Q. And was that overtime paid by the
13 city?

14 A. Yes.

15 Q. Apart from Commissioner Ross and
16 Deputy Commissioner Patterson, was there anyone
17 else that you were reporting to at that time?

18 A. Yes. In terms of receiving my
19 orders, I would receive my orders from the
20 Deputy Commissioner and Commissioner Patterson
21 and Commissioner Ross. But I worked jointly --
22 I was supposed to work jointly with Ted Qualli
23 and the board to obtain the resources and --
24 that we needed for PAL, and develop programs for
25 the kids at the PAL centers, and basically run

1 E. CINTRON

2 the day-to-day operations of the PAL as a whole.

3 Q. So when you say that -- and I'll
4 come back to Ted and the board in a moment, but
5 you said that the orders would come from Deputy
6 Commissioner Patterson or Commissioner Ross, is
7 that right that they were -- you would report up
8 to them in the chain of command?

9 A. Yes. In the structure of the chain
10 of command, I would report to them. But a lot
11 of my instructions came from the board in terms
12 of PAL matters.

13 Q. Can you tell me what instructions
14 came to you from the board?

15 A. The board would plan events,
16 programming, initiatives, community events. And
17 they would direct what they wanted to be done
18 for us to implement.

19 Q. And when you say "for us to
20 implement," do you mean the police officers, the
21 civilian employees, or both?

22 A. Everyone. Everyone involved in any
23 of those events or community initiatives.

24 Q. Just -- let me back up.

25 PAL is a -- it's an -- let me do this.

1 E. CINTRON

2 MR. GOLDEN: We'll do PAL-2, Ike?

3 MR. GREEN: Sounds good.

4 MR. GOLDEN: Just this is a --
5 I'm going to give it --

6 Ms. Cintron I'm going to have
7 this labeled PAL-2. You don't need
8 to go through the whole thing. If
9 you would like to, we can go off the
10 record and you agree to do that, but
11 what I would like to do is I'm just
12 going to ask you some specific
13 questions about this, and we can
14 work our way through it. But if you
15 would like, we can take a short
16 break and you can read it. Do you
17 mind how we handle that?

18 THE WITNESS: I would rather read
19 it.

20 MR. GOLDEN: Okay.

21 THE WITNESS: And take -- you
22 know, take a break to read it.

23 MR. GOLDEN: All right. We will
24 take -- we'll go off the record.

25 THE VIDEOGRAPHER: The time is

1 E. CINTRON

2 11:52. We are off the record.

3 (First Amended Complaint is
4 received and marked as Exhibit PAL-2
5 for identification, as of this
6 date.)

7 (A break was taken.)

8 THE VIDEOGRAPHER: The time is
9 12:09. We are now on the record.

10 MR. GREEN: Excuse me, what was
11 the last question that was asked,
12 and the answer?

13 MR. GOLDEN: Well, I was asking
14 about -- I was going to ask
15 questions about PAL.

16 MR. GREEN: Okay.

17 Q. Ms. Cintron, in the document we've
18 labeled as PAL-2, in paragraph 5 it talks about
19 PAL being a nonprofit organization, and in
20 paragraph 6, an independently organized
21 nonprofit. So am I to understand it correctly,
22 it is a -- PAL itself is a separate nonprofit
23 organization that works with the city?

24 A. Yes. The Philadelphia Police
25 Athletic League began, as we know, 75 years

1 E. CINTRON

2 ago --

3 (Court reporter clarification.)

4 A. Philadelphia Police Department PAL
5 unit was established 75 years ago. And they
6 began to work in collaboration with PAL, the
7 nonprofit unit, to achieve the initiatives in
8 the community.

9 Q. So if I heard that correctly, there
10 is -- within the police department, there's a
11 unit that is assigned to PAL; is that correct?

12 A. PAL is a unit, and officers are
13 assigned to a unit, yes.

14 Q. And those officers that are assigned
15 to the unit, they work with the PAL nonprofit
16 organization, correct?

17 A. Yes.

18 Q. So what I want to do to be clear is,
19 there's a police unit on one hand, and then
20 there's the nonprofit organization on another.
21 I just want to -- for the purposes of my next
22 couple of questions, those are -- there are
23 two -- two entities, correct?

24 A. They are two entities working
25 together.

1 E. CINTRON

2 Q. In terms of the PAL unit, you were
3 the commanding officer, correct?

4 A. Yes.

5 Q. And the -- approximately how many
6 police officers were assigned to the unit?

7 A. At the time I believe it was 27, two
8 sergeants.

9 Q. So that the 27 includes the two
10 sergeants?

11 A. No, I think it was 27 police
12 officers and two sergeants, approximately.

13 Q. And did the -- did the police
14 officers, in terms of their chain of command,
15 did they report to the sergeants?

16 A. Yes. It's still the same
17 chain-of-command structure.

18 Q. And then those sergeants would
19 report to you, correct?

20 A. Yes.

21 Q. Apart from the sergeants and the
22 police officers, did anyone else in the unit
23 report to you?

24 A. I would consult with the PAL staff
25 in reference to all matters.

1 E. CINTRON

2 Q. And when you say "staff," is that --
3 do you mean to say the employees of the
4 nonprofit?

5 A. I'm referring to Ted Qualli, as the
6 director, and I were supposed to be working
7 together to manage everyone in the PAL unit.

8 Q. Ted --

9 A. With the exception that Ted Qualli,
10 by not being a sworn police officer or
11 supervisor, cannot dictate orders to the
12 officers. So anything that Ted required, he
13 would have to do it by letting the sergeant
14 know, or I know, so that we can let the officers
15 know what they need to do.

16 Q. Gotcha. So if Ted needed something
17 from one of the police officers, he would need
18 to either work through you or the sergeants to
19 have that order -- that they would need -- you
20 or those sergeants would need to give those
21 orders, correct?

22 A. If there was anything in reference
23 to an order, yes.

24 Q. And do you know -- do you know who
25 Ted reported to?

1 E. CINTRON

2 A. Ted reported to the board. Board
3 chair Bernie Prazenica, and co-chair at the
4 time, Ron Rabena.

5 Q. And within -- to give you -- who
6 within PAL reported to Ted?

7 A. The way he had it structured,
8 everything went to Ted for approval.

9 Q. So, what I mean by that is if
10 there's a PAL -- for example, the name -- you
11 know the name Chase Trimmer; is that correct?

12 A. Yes.

13 Q. Did Mr. Trimmer report to Ted?

14 A. Ted was his supervisor, but he
15 worked with me on programs.

16 Q. So that was my question.

17 Mr. Trimmer would -- could work with you,
18 but he reported to Ted, correct?

19 A. Ted was his immediate supervisor,
20 yes.

21 Q. And Mr. Trimmer was a PAL employee;
22 is that correct?

23 A. Yes. But, in part, he would also
24 report to me in terms of working with me with
25 the programs and initiatives.

1 E. CINTRON

2 Q. For Ted, do you know who paid his
3 salary?

4 A. The Police Athletic League, the
5 nonprofit.

6 Q. And do you know, if you know, do you
7 know who paid Mr. Trimmer's salary?

8 A. The Police Athletic League, the
9 nonprofit.

10 Q. Did Mr. Qualli have the ability to
11 discipline or reprimand any of your officers?

12 A. He didn't have the ability to do so
13 because of departmental policy, but he would
14 bring the complaints to me, and I would
15 discipline accordingly.

16 Q. What is that, the policy you just
17 mentioned? I'm sorry, I -- the discipline --

18 A. Because Ted Qualli is not employed
19 by the City of Philadelphia, he cannot impose
20 the disciplinary process on police officers.

21 Q. Did -- as the commanding officer,
22 did you have the ability to discipline PAL
23 employees?

24 A. That would be done through Ted.
25 Anything official would have gone through Ted.

1 E. CINTRON

2 Q. So I think it's -- if I'm hearing
3 you correctly, if Ted had a problem with a
4 police officer, he did not have the authority to
5 do anything. It had to go through you,
6 correct?

7 A. Yes.

8 Q. And if you had a problem with one of
9 his employees, it would have to go through Ted
10 to take any kind of adverse action, correct?

11 A. Not necessarily, because they also
12 reported to me.

13 Q. And so the --

14 A. Under the structure, Ted and I were
15 responsible for supervising everyone in the
16 unit. The only exception was that because of
17 sworn police personnel having contractual
18 agreements and a union that had to be done
19 through me, any official actions had to be done
20 through me.

21 Q. Do you recall any instances where,
22 on your own, without Ted's involvement, you
23 disciplined a PAL employee?

24 A. I never disciplined anyone without
25 Ted's knowledge. He knew that I was going to

1 E. CINTRON

2 speak to someone in reference to an incident at
3 PAL.

4 Q. Is that the incident between
5 Mr. Trimmer and Officer Clayman?

6 A. No. I never disciplined Chase
7 Trimmer.

8 Q. Then the incident that you referred
9 to, what was that incident where you went to
10 Ted?

11 A. I asked Ted to address a problem
12 with one of his employees -- actually, several
13 of the PAL employees at different times, and in
14 reference to condescending remarks,
15 inappropriate remarks. And Ted would laugh it
16 off and would tell me that people can say what
17 they want to say.

18 Q. So these were --

19 A. And he would never address any
20 discipline issues with his staff, that I brought
21 to his attention.

22 Q. If Mr. Qualli did not do that, why
23 would you not discipline them yourself?

24 A. I would try to go through Ted out of
25 respect that they reported to him. But when

1 E. CINTRON

2 with no avail or remedial actions taken, I would
3 have to address certain issues myself.

4 Q. And did you ever have a situation
5 where you addressed that situation with a
6 specific PAL employee?

7 A. What situation?

8 Q. Well, you're saying if you
9 reported -- if you tried to go through Ted, and
10 no remedial action was taken, I'm asking, do you
11 recall any instances where you yourself then
12 took remedial action as it relates to that PAL
13 employee?

14 A. I didn't take official remedial
15 action against any PAL employee. I spoke to PAL
16 employees about different issues that were
17 happening at the center -- I mean, at the -- at
18 PAL.

19 Q. Did Mr. Qualli have the ability to
20 fire police officers?

21 A. No.

22 Q. Did you have the ability to fire PAL
23 employees?

24 A. No. Well, let me reframe that. I
25 didn't have the authority to fire anyone. But

1 E. CINTRON

2 while Ted was executive director of PAL, he did
3 fire a multitude of PAL employees.

4 Q. And those were, like, PAL employees
5 that reported to him?

6 A. Yes.

7 Q. When you joined PAL, did you sign
8 any contract or agreement governing your
9 relationship with them?

10 A. No. We were -- I was told -- we
11 were told, when we were in the same, you know,
12 room, talking with the deputies, as well as PAL
13 staff and PAL board members, that Ted and I held
14 the same responsibilities as the top leadership.
15 And that we will work jointly to resolve all
16 matters involving PAL. But nothing was done
17 officially on paper.

18 Q. I'm sorry. One question I -- I'll
19 come back.

20 In your role as the commanding officer,
21 was there anyone within PAL, Ted or otherwise,
22 that had the ability to discipline you?

23 A. I would get reprimanded sometimes by
24 Ron Rabena or Prazenica based on either false
25 information that was told to them by Ted Qualli,

1 E. CINTRON

2 or misleading information that they were being
3 told, without looking into my side of the story,
4 or what actually happened.

5 Q. So are there -- is there a specific
6 incident or incidents where Ron took adverse
7 action against you?

8 A. Yes.

9 Q. What do you -- can you identify
10 those incidents for me?

11 A. Okay. Well, Ron Rabena, the very
12 first day that I met Ron Rabena, he began to ask
13 me if I would do him a favor and have a young
14 man that was at the 17th District, a police
15 officer that was related to him -- at one time
16 he said related to him; another time he said it
17 was a friend's son, so I'm not quite sure what
18 was the relation -- the relationship there. And
19 he asked me to have this individual transferred
20 into the unit, wrote his name on a piece of
21 paper, and I told him there was a process to
22 having officers transferred into the unit, and
23 that I will look into it to see if this officer
24 had the qualifications to come to the Police
25 Athletic League -- to transfer into the Police

1 E. CINTRON

2 Athletic League.

3 When I looked into the matter, the
4 individual had less than or approximately two
5 years on the job. He did not meet the
6 qualifications to transfer into PAL. He didn't
7 have the points required of a transfer into a
8 special unit, which is points that officers
9 accumulate based on their time on the job,
10 accommodations, work in the community, basically
11 experience, and sick-time usage, and whether or
12 not they had -- they were involved in any
13 disciplinary matters at that time.

14 And when I looked into it, this officer
15 didn't meet the qualifications. He didn't have
16 the points. He didn't have the time. He didn't
17 have the experience. So I relayed that
18 information back to Ron Rabena, who still
19 insisted that I transfer this officer to the
20 unit. Every time I saw Ron Rabena, he would
21 bring up the topic, and I had to reiterate to
22 him at least four or five times that I cannot
23 bring the officer to the unit, that my decision
24 to transfer officers into the unit was based on,
25 you know, whether or not they were on that

1 E. CINTRON

2 transfer list and qualified to be transferred
3 into the unit.

4 After about the fourth or fifth
5 conversation, I then received a call from the
6 captain from the 17th District, who stated that
7 she was calling me because Ron Rabena asked her
8 to call me about the same young man that he
9 wanted transferred into the unit. And she began
10 to give me praises about the officer and why he
11 would be a good fit at PAL.

12 I explained to the captain that I would
13 not transfer the officer in because, one, he
14 didn't meet the qualifications. And I didn't
15 have the authority to transfer this officer in
16 or requesting for this officer to be transferred
17 in, based on that information I just gave you.

18 A week after that, I went to visit the
19 center, southwest PAL center. The officer was
20 working at the center. So I asked the officer,
21 like, what are you doing here? And the officer
22 stated that the captain from the 17th was
23 assigning him to PAL, even though he was
24 supposed to be working in the district.

25 At that point, I called the captain, and I

1 E. CINTRON

2 told her that it's a liability to have an
3 officer working at PAL without being properly
4 checked out because we do like a child
5 background check, and he didn't have an official
6 transfer into the unit. And I was actually a
7 little upset because, you know, you don't -- you
8 don't do that to another commander, like, send
9 somebody to the unit without their permission or
10 knowledge.

11 And I then reported this incident to
12 Deputy Commissioner Patterson. And the officer
13 was instructed that he cannot work on the PAL
14 center until he meets the qualifications to come
15 to PAL, or he's transferred into the unit.

16 I then received a call from Darrell
17 Clarke, city council president, who literally
18 threatened me and told me that he was calling me
19 about a mutual acquaintance. He mentioned Ron
20 Rabena, and he began to talk to me about this
21 officer that Ron Rabena wanted transferred to
22 the unit.

23 At that point, I again explained to the
24 council president that -- the reasons why I
25 couldn't have this officer transferred into the

1 E. CINTRON

2 unit, and explained to him that, you know, the
3 officer had to go through the process. And that
4 I would not violate departmental policy by what
5 we call parachuting an individual into a unit.
6 Which means, in the police department, that
7 you're basically bypassing the policy and the
8 rules to get someone into a unit, that's
9 considered a good unit to work in.

10 And at that point, the counsel president
11 told me, Well, I guess I'm going to have to make
12 a few calls about you, and, he says, starting
13 with your boss, Richard Ross.

14 I, at that point, told him that he could
15 call whoever he wants because I was -- I didn't
16 have the authority to do that. And I told him
17 that if you wanted to call Commissioner Ross,
18 then that was his discretion.

19 I took that as a threat, especially since
20 he mentioned, I'm going to call a few people
21 about you. And intimidating. They were
22 intimidating me into transferring this officer
23 into the unit. And, at that point, again I
24 reported this to the deputy.

25 Q. Do you recall when that phone call

1 E. CINTRON

2 with Darrell Clarke occurred?

3 A. This happened in the few months that
4 I was at PAL. Like this was early on.

5 Q. And so, if I understood you
6 correctly, Ron wanted the officer transferred
7 into the PAL unit, correct?

8 A. Yes.

9 Q. And -- but in the end, the -- well,
10 was that officer ever transferred into the PAL
11 unit?

12 A. Yes, as soon as I left the unit.

13 Q. And so in terms of transferring
14 officers in and out of the unit, who had the
15 authority to do that?

16 A. I could only suggest or request
17 personnel based on who is on the transfer list
18 and qualified to come. The ultimate decision is
19 done by a superior officer. In this case, it
20 was Deputy Commissioner Sullivan. And the
21 reason I know this is because, when Deputy
22 Commissioner Sullivan got promoted to that
23 position, they called a meeting at Bernie
24 Prazenica's office, 6ABC, and Commissioner
25 Sullivan was present. And as soon as he walked

1 E. CINTRON

2 into the room, he looked at me, went around,
3 shook everybody's hand except mine. He flagged
4 me literally with his hand, one of these
5 motions, and said to Bernie Prazenica, Don't
6 worry about her. In reference to the Memorandum
7 of Understanding, I'm going to make that go
8 away. And then he turned to Ron Rabena -- to
9 Ron Rabena -- And as far as that transfer of
10 that young man in the 17th District, don't worry
11 about that. I'm going to make it happen.

12 Q. Okay. And that conversation
13 happened when --

14 A. When we had a meeting at 6ABC in
15 Bernie Prazenica's office.

16 Q. And that's when Deputy Commissioner
17 took -- took over --

18 A. As soon as he came to PAL.

19 Q. Do you recall when that happened?

20 A. When he got promoted to deputy
21 commissioner, which was May of, I believe,
22 '17 -- I don't know. May 7th, I believe it was.

23 Q. But sometime in May 2017?

24 A. Yes.

25 Q. And then the officer was transferred

1 E. CINTRON

2 into the PAL unit after your employment ended?

3 A. Well, by then, I went out on leave
4 because of all of this stuff that was going on.
5 And, eventually, that officer was transferred
6 into the unit.

7 Q. Do you know when the officer was
8 transferred in?

9 A. No. I just know that he's in the
10 unit now.

11 Q. Do you know if he had accumulated
12 the points or the qualifications necessary to
13 transfer in?

14 A. No, I'm not aware. He was really
15 far from having those qualifications because one
16 is having five years on the job, and he only had
17 two. So I do not think he had the
18 qualifications.

19 Q. So he had two years experience
20 when -- in when, '16, when you joined?

21 A. Yes.

22 Q. Do you remember the officer's name?

23 A. To be quite honest with you, it's
24 probably written somewhere, but I can't remember
25 off the top of my head.

1 E. CINTRON

2 Q. So it was Ron Rabena who wanted the
3 officer to, quote, parachute into the unit,
4 correct?

5 A. Yes.

6 Q. But he did not have the authority to
7 do that, correct?

8 A. Right. Which is why he was going
9 through all these means to intimidate me into
10 having him transferred into the unit.

11 Q. Because the decision to do that
12 would go through you, correct?

13 A. The decision to have him transferred
14 in, no. I could only request based on who is on
15 that list. And he wasn't on the list because he
16 didn't qualify.

17 Q. So there's a protocol within the
18 police department that governs how officers come
19 in and out of PAL?

20 A. Yes. It's, I believe, Directive 12.
21 Now, there is what we call parachuting, which is
22 someone in the authority of commissioner can
23 transfer someone in.

24 Q. So that -- what I had asked was
25 instances where anyone from PAL had taken

1 E. CINTRON

2 adverse action against you. You identified Ron
3 and Bernie. And so when you said the adverse
4 action, is it kind of the messaging that came
5 from Ron?

6 A. It was the interference that they
7 would cause in my ability to do my job. It was
8 the influence, their influence to have council
9 president call me and threaten me. It was
10 their -- the way they circumvented me, keeping
11 me out of the loop on important matters, keeping
12 me out of decision-making meetings, not sending
13 me chain emails that I should have gotten so
14 that I could do my job effectively so that they
15 could go directly to the deputy -- Deputy
16 Commissioner Sullivan to get the results that
17 they wanted.

18 Q. Let me back up and clarify. Deputy
19 Commissioner Sullivan, when he -- sorry. When
20 you were originally appointed as commanding
21 officer of PAL, you were reporting to Deputy
22 Commissioner Patterson, correct?

23 A. Yes.

24 Q. And that changed at some point, and
25 you began reporting to Deputy Commissioner

1 E. CINTRON

2 Sullivan, correct?

3 A. Yes. When Deputy Commissioner
4 Sullivan got promoted to Deputy Commissioner, he
5 went to Deputy Commissioner Patterson
6 and requested to oversee the PAL unit, even
7 though the PAL unit wasn't under the purview of
8 deputy of operations.

9 Q. So let's break that out. Is it
10 deputy commissioner of operation, is that -- how
11 many deputy commissioners are there?

12 A. Well, at the time, there was --
13 there's usually four. Four to seven, they
14 handle different parts of running the
15 department. You have a Deputy Commissioner of
16 Patrol, Patrol and Operations, which that was
17 Deputy Commissioner Sullivan's title. You have
18 Deputy Commissioner of Organizational Services.
19 There's, like, different titles. So PAL would
20 have fallen under the Deputy Commissioner of
21 Organizational Services, which was DC Patterson.
22 But DC Sullivan volunteered to take over PAL.
23 And I received a call from Deputy Commissioner
24 Patterson, who told me that. He says -- he
25 actually made a joke of it and said it's part of

1 E. CINTRON

2 my command, but if he wants to take it over, it
3 alleviates some work from my desk. And that's
4 how DC Sullivan ended up being in control of
5 PAL.

6 Q. So was Deputy Commissioner Sullivan
7 the Deputy Commissioner of Organizational
8 Services?

9 A. He was Patrol. So he would have
10 been in charge of officers working districts,
11 making arrests.

12 Q. So do you know who is -- who is
13 Deputy Commissioner Sullivan paid his salary by?

14 A. City of Philadelphia.

15 Q. Do you know, does PAL pay him any
16 salary?

17 A. I know that PAL supports his
18 nonprofit organization.

19 Q. Does PAL support other nonprofits?

20 A. Yes, they do.

21 Q. And so do they -- do you know, do
22 they pay him -- apart from the nonprofits, do
23 they pay him any salary?

24 A. I don't know.

25 Q. Any other actions by Ron where he

1 E. CINTRON

2 took adverse action against you?

3 A. Just to circumventing me to go to
4 the deputy, to make false complaints about me
5 that were not accurate. And circumvent -- like
6 basically circumventing my authority as the
7 commanding officer of the Police Athletic
8 League.

9 Q. Can you give me any, like, examples,
10 any specific examples of that?

11 A. Yes. There was a situation where
12 the -- as soon as I got to PAL, the very first
13 week I got to PAL, Ted Qualli, Sunny Lee, and
14 Pat Winter approached me with a policy that they
15 wanted me to implement. In that policy, they
16 changed the whole structure, whereas everything
17 would go through final authority, and approval
18 will go through Ted, and the board basically
19 taking me out of the whole equation as the
20 commanding officer.

21 I didn't feel comfortable with signing
22 that policy, so I took that policy to the police
23 commissioner for his review. He agreed that I
24 should not sign the policy, and called for a
25 meeting.

1 E. CINTRON

2 We had a meeting in the commissioner's
3 office where Ron Rabena attended, Bernie
4 Prazenica, Ted Qualli, myself, Deputy
5 Commissioner Patterson, and the commissioner's
6 legal adviser. He's an attorney, Captain
7 Hailey.

8 At that meeting, I expressed my concerns
9 about this policy. So did the commissioner.
10 And the commissioner ordered Captain Hailey to
11 draw up a memorandum of understanding to outline
12 everyone's authority in this policy. And to
13 solidify the relationship between PAL and the
14 board, because the policy they were presenting
15 didn't correctly represent that collaboration.

16 At that point, Captain Hailey began to
17 draw up this memorandum of understanding that
18 the board, Bernie Prazenica, and Ron Rabena did
19 not want for it to be implemented. They said
20 that at the meeting; they said that after the
21 meeting.

22 And at that point, they were, like, really
23 upset that this memorandum would have some checks
24 and balances in place to make sure that there is no
25 corruption, that there's no -- anything going on

1 E. CINTRON

2 that could be misconstrued, you know, with the --
3 in the community.

4 So Captain Hailey began to draw up this
5 document, and right before the document was
6 supposed to be released, which was supposed to
7 be in December of 2017, it was like the final
8 draft for everybody to go over. And, obviously,
9 they would have made different adjustments on
10 both sides, but when it was announced that it
11 was going to be discussed December of 2017, I
12 received a call from -- actually, I got -- Ted
13 Qualli came to my office to tell me that he had
14 spoken to Maureen Rush, and Maureen Rush wanted
15 to set up a meeting with me. And I asked Ted
16 Qualli why she didn't call my phone, or why she
17 didn't email me. He said, We were just having a
18 conversation, and she brought it up.

19 I said, Okay, no problem.

20 He said, I believe she wants to talk about
21 programs.

22 I said, Okay, have her call me.

23 When Maureen Rush called me, she
24 specifically said that we were meeting about
25 programs. She wanted to coordinate programs

1 E. CINTRON

2 with the University of Penn and PAL, and she
3 wanted to discuss these programs with me.

4 So under false pretense, she calls me the
5 day of the meeting, and she tells me, I don't
6 want to meet at Penn, my office, and I don't
7 want to meet at PAL, so can you meet me at a
8 restaurant -- which was located underground,
9 like in the basement of a hotel located near the
10 University of Penn.

11 When I met her there, excited to talk
12 about programs, she told me, No, hold up right
13 there. We are not going to talk about that
14 right now because I want us to be both relaxed
15 to talk about what I really brought you down
16 here for.

17 And at that point, I got a knot in my
18 stomach, and I realized that it was a ploy to
19 get me down there for something else, which was
20 common for PAL and Ted Qualli to do.

21 So we ate dinner. She began to say,
22 You're really down here about the memorandum of
23 understanding.

24 And immediately I said, Who put you up to
25 this? And she -- I said -- and I said, Was it

1 E. CINTRON

2 Ted Qualli, Ron Rabena, and Prazenica?

3 And she said, Yes. She said, Yeah, it was
4 the good old boys. They wanted me to bring you
5 down here and talk to you, woman to woman,
6 that -- for you to let go of this issue about
7 the MOU. Which she was talking about the
8 memorandum of understanding.

9 At that point, I told Maureen Rush that,
10 you know, it was not right for them to get me to
11 have this meeting with her under false pretense
12 that we were going to talk about programs. And
13 she said, Well, the guys wanted me to talk to
14 you woman to woman, and so here we are.

15 She then proceeded to tell me that I
16 should let Ted Qualli run the show, and sit
17 back, put my feet up, and collect the check.
18 And she said, Just let the men handle everything
19 at PAL because it's not going to go good for
20 you, and this is not going to end well for you.

21 And, at that point, you know, I posed the
22 question to her, I said, as a woman, you know,
23 it's hard to get women to leadership positions.
24 And we have to work double as hard to get to
25 positions that we want to achieve. And I told

1 E. CINTRON

2 her, like, Would you do this? Would you allow a
3 man to run the show while you sit back and
4 collect a check? And I said, Because I know I
5 can't, because I have integrity, and I would not
6 do that.

7 And then she said, Well, I'm just letting
8 you know, it's not going to go well for you. In
9 the end you're going to lose. And, basically,
10 that was the end of the conversation.

11 She then offered to buy me dessert, and I
12 told her no, and I got up and left.

13 Q. What was the name of this
14 restaurant?

15 A. I can't recall, but it's University
16 of Penn, by the University of Penn, and it's in
17 the basement.

18 Q. Is it in the University of
19 Pennsylvania --

20 A. If I drive by there, I'm pretty sure
21 I can identify it, but I don't remember the name
22 right now.

23 Q. Maureen Rush is the -- is it the
24 director of public safety for the University of
25 Penn?

1 E. CINTRON

2 A. Yes. But she used to be a
3 lieutenant for the Philadelphia Police
4 Department before.

5 Q. Do you know when she last was acting
6 as a lieutenant for the city?

7 A. No. I just know she's a board
8 member, part of the executive board, part of the
9 board.

10 Q. When you had this meeting with her,
11 was she -- was she then an employee of the city?

12 A. No. She's the director of the
13 University of Penn Police. And a board member
14 of PAL.

15 Q. Ms. Cintron, if you wouldn't mind,
16 in what we've marked Number 2, that complaint,
17 would you mind flipping to page 7. And if you
18 look at paragraph 41, it says: Plaintiff met
19 with Ms. Rush on October 24, 2016. Is that the
20 meeting that you're referring to with Ms. Rush?

21 A. It probably was, yes. To be honest
22 with you, I can't remember the exact date. I
23 believe that is the date because I remember it
24 happened a few months before -- it happened
25 right after they announced that the MOU would

1 E. CINTRON

2 come out, after Bernie inquired about when the
3 MOU would come out. And he was told that it
4 would be finalized by December. And this
5 happened a few months prior.

6 Q. Okay. Just so we're clear --

7 A. So, basically, Bernie Prazenica was
8 informed that Captain Hailey was instructed to
9 have it completed by December, and that they
10 would give the final draft by December. Right
11 after that is when Maureen Rush wanted to set up
12 this meeting or set up the meeting.

13 MR. GOLDEN: PAL-3.

14 (Email 10/17/16 is received and
15 marked as Exhibit PAL-3 for
16 identification, as of this date.)

17 Q. Ms. Cintron, you'll see that in the
18 complaint in paragraph 38, it points out that in
19 October of 2016, you received an email from
20 Danielle Faust, the executive assistant to
21 Ms. Rush, and then paragraph 40 says the email
22 from Ms. -- from Faust was sent to schedule a
23 convenient time for plaintiff to meet with
24 Ms. Rush.

25 Is it your understanding that this email

1 E. CINTRON

2 on the front of page 3 is that email on
3 October 17, 2016?

4 A. Yes. But at the same time, we were
5 also discussing about -- we were also discussing
6 having a meeting where the whole team could meet
7 about a football event. So it almost seems like
8 it's the same chain of emails, if that makes
9 sense. Because it was like we were trying to
10 coordinate two separate meetings; one about the
11 football, which was a meeting that we were going
12 to meet to coordinate this football event with
13 the entire team, that was going to be involved
14 in carrying out duties for this event, and the
15 meeting that she requested separately. That's
16 why I'm not a hundred percent sure of the date.

17 Q. Well, if you look at that email,
18 PAL-3, from Danielle, it's addressed to -- says:
19 Hello Evelyn, Following up with Maureen's
20 request to find time for you to meet our DPS
21 team.

22 And then below that, the second bullet, is
23 October 24 from 2:30 to 3:30. Do you see that?

24 A. Yes. So we did meet -- the DPS met
25 a week prior to this meeting that I had with

1 E. CINTRON

2 Rush individually, so it happened around the
3 same time.

4 Q. So you -- if I heard that
5 correctly --

6 A. Maureen Rush had called me to set up
7 the time when she told me that she didn't want
8 to meet in the office, that she didn't want to
9 meet at Penn.

10 Q. And so if I heard you correctly,
11 your meeting with Maureen happened. And then a
12 week later the meeting with the DPS team
13 occurred; is that correct?

14 A. The other way around.

15 Q. Okay. So --

16 A. I met her -- we met as a team to
17 discuss football events, the football
18 championship. And I met with her after that,
19 about the memorandum of understanding.

20 Q. And was Ted Qualli in the meeting
21 with her, with Maureen Rush, about the DPS?

22 A. I don't think he went to that
23 meeting. I can't recall.

24 Q. Just so I can be clear in the
25 sequencing of events, you have the DPS meeting

1 E. CINTRON

2 with Maureen Rush, and then you have the meeting
3 between yourself and only yourself with Maureen
4 Rush, correct?

5 A. Yes.

6 Q. Is there anything else you remember
7 being said in that meeting with Maureen Rush?

8 A. What I stated.

9 Q. So that's everything you recall
10 about the meeting?

11 A. Yes.

12 Q. What I would like to do,
13 Ms. Cintron, is I am -- earlier, I had asked you
14 about any adverse action that had been taken
15 against you by anybody at PAL. So let me ask a
16 more specific question.

17 Was there ever a time when you were the
18 commanding officer, where anyone at PAL reduced
19 your pay?

20 A. No.

21 Q. Was there a time when you were the
22 commanding officer for PAL, where anyone from
23 PAL gave you a written reprimand?

24 A. No. Ted Qualli verbally abused me
25 several times, by coming into my office, yelling

1 E. CINTRON

2 at me.

3 Q. Well, so -- okay. So Ted came into
4 your office and yelled. But did he ever do
5 anything, did he ever suspend you or give you a
6 written warning or any kind of tangible,
7 adverse --

8 A. No.

9 Q. -- [unintelligible]?

10 A. No.

11 Q. Did anyone from PAL suspend you?

12 A. No.

13 Q. Did anyone from PAL take away or
14 reduce your pay or benefits?

15 A. I believe so.

16 Q. Can you tell me why you believe
17 that?

18 A. Not directly, but indirectly they
19 did.

20 Q. How did they do that?

21 A. Because it was me voicing my opinion
22 about the inequality in the centers, about the
23 way I was being mistreated that led for me to
24 have to leave this job. And I went from
25 \$120,000 to \$56,000 a year. My whole career was

1 E. CINTRON

2 interrupted and ended, and it was as a result of
3 their actions.

4 Q. Their actions, how? Someone from
5 PAL?

6 A. Yes.

7 Q. And can you tell me who specifically
8 at PAL did that?

9 A. Bernie Prazenica, Ron Rabena, Ted
10 Qualli. Ted Qualli, as he said many times,
11 acted under the guidance of the board. And a
12 lot of the decisions he made to circumvent me
13 was based on the meetings that he would have
14 with -- the decision-making meetings that he
15 would have with Bernie Prazenica and Ron Rabena
16 that I was excluded from. And based on that, it
17 led to me having to leave the job, because I was
18 put in a hostile work environment where I was
19 being circumvented, disrespected, belittled, and
20 unable to do my job accurately, because they
21 refused to work jointly with me like we were
22 supposed to be working together.

23 Q. What is your understanding of why
24 Ted did those things? What was the cause of his
25 actions?

1 E. CINTRON

2 A. I believe that it was several
3 reasons. I believe that from the beginning, I
4 felt that because they always had these private
5 meetings among the men, that I would never be
6 included in, they made all the decisions, and
7 then Ted would come down and dictate to me how
8 things were going to be, even if that meant that
9 departmental policies would be violated, even if
10 that meant that I contested paying officers
11 under the table, which is against the law, and
12 things of that nature. Me voicing my opinion
13 about having kids attend the Wissinoming Center
14 that I closed down.

15 And the reason I closed the Wissinoming
16 PAL center down was because my first week at
17 PAL, the first thing that we decided to do was
18 to visit the centers, so that I could get to
19 know the centers and where they are located and
20 how things operate, and basically do a tour of
21 all the centers in the city. And we took three
22 days out in the calendar to be able to do that
23 because there was 15 centers located throughout
24 the city.

25 When we went -- on the second day that we

1 E. CINTRON

2 went out, we went to visit the Wissinoming PAL
3 Center, and when I walked in the center, it was
4 in deplorable conditions. It smelled like
5 mildew and mold. And I immediately got sick,
6 couldn't even stay in the building. I had to
7 run out and throw up.

8 And I was followed outside by Kevin Frame,
9 the facilities manager, Sunny Lee -- and --
10 Sunny Lee, and they both began to talk to me
11 about problems they had in the building in the
12 past that led to a lawsuit. I think it was
13 Zenak versus the City of Philadelphia. And when
14 I looked up, Ted was coming out, and I saw him,
15 as I was throwing up, through my peripheral
16 vision. And I saw Ted with his finger telling
17 them not to tell me anything. Like, basically
18 telling them, signaling them not to tell me
19 anything.

20 And at that point I knew something was
21 going on. It's my, what, third day at PAL. So,
22 you know, I was feeling sick at the moment. So
23 I didn't know what was going on.

24 So I then decided to go to visit the PAL
25 Center on my own. And this time Officer Younger

1 E. CINTRON

2 was in the center, who was the officer
3 assigned -- was the officer assigned to the
4 center, and he was -- had a mask on, and he was
5 cleaning mold off the walls and the floor. And
6 told -- and explained to me that he was mopping
7 the floors and cleaning up the center so that he
8 can reopen up the center for the kids.

9 And I told him, Well, how long has this
10 been going on? And he said, I'll show you,
11 Lieutenant, and he went to his office and got a
12 stack of papers that he had been reporting that
13 this mold and mildew in the center has been
14 going on for over three years. And that he was
15 put in that center because the white officer
16 didn't want to work the center no more, and him
17 being a new officer assigned to PAL, they put
18 him there. And he ended up having to work that
19 center.

20 He gave me a stack of papers with
21 pictures, multiple emails that dated back three
22 years, and nothing was ever done to remedy the
23 mold and the mildew and the problems in that
24 center that left water on the floor, causing
25 kids to fall, and different injuries that the

1 E. CINTRON

2 officer reported.

3 I then asked the officer, Was it ever
4 fixed? And he explained to me that when the
5 city had the judgment in the other case, they
6 patched it up by cleaning it and painting over
7 it, but they really never took care of the
8 actual problems.

9 And he's been dealing with this issue for
10 a long time, which caused him to get respiratory
11 problems, having to seek medical attention, and
12 the center that used to be vibrant of 150 kids
13 attending the center, stopped coming because of
14 the mildew and smell in the center, and kids
15 having to be taken to the hospital for asthma
16 treatments and other treatments because of the
17 problems at that PAL center.

18 He says, To be honest with you, the only
19 kids that come here is the kids that don't have
20 nowhere to go after school, and that's about 12,
21 13 kids.

22 He said, The problem is, they don't want
23 to shut the center down because of funding.
24 They get a lot of funding for the center, even
25 though it's not a viable center right now.

1 E. CINTRON

2 And at that point, I called both my
3 sergeants to meet me at the center, and I called
4 Ted Qualli to also come to the center and meet
5 me at the center.

6 As a commanding officer with experience, I
7 know that it's not wise to make decisions soon
8 after you get into a unit, and I've never done
9 that. But in this situation, it broke my heart
10 that the kids had to endure having to come to a
11 center under those conditions. And I
12 immediately shut the center down and had to make
13 that decision, which would have been logical for
14 any person to make.

15 And I told the officer, I don't want you
16 to unpack anything or do anything. A
17 professional really has to come in here to clean
18 up this mess. And I told him, Because as of
19 now, the center is going to be closed.

20 And I did this when the sergeants and Ted
21 Qualli was present. And Ted Qualli immediately
22 told me, You can't do that. The board is the
23 only one that can make that decision. And I
24 told Ted Qualli that I would have to disagree
25 because, as a commanding officer, it's my

1 E. CINTRON

2 responsibility to ensure that the kids are safe
3 and that the officers are safe and that the
4 community is safe, and that I cannot, in good
5 judgment, leave a center open knowing that these
6 kids were being exposed to mold spores and
7 deplorable conditions like the ones I saw at the
8 center.

9 At that point, I shut down the center. A
10 few days later -- call it intuition -- I went
11 back to the center to make sure that the work
12 that -- was getting done and that they were
13 cleaning up, and that the maintenance team was
14 out there, because they were supposed to go out
15 there to check out the center.

16 And when I got there, Officer Younger was
17 in there again, and he was setting up the
18 classroom and setting up supplies. And when I
19 asked him, What are you doing? The center is
20 closed down. You're supposed to be reassigned
21 to another center. And he said that Sergeant
22 Faust and Sergeant Irving ordered him to reopen
23 up the center because Ted told them to open up
24 the center. Because I had no authority to shut
25 down the center the way that I did.

1 E. CINTRON

2 And they did this behind my back because
3 neither sergeants informed me that they were
4 going to do that, because if they had informed
5 me, I would have -- it was a standing order on
6 my part that the center was to remain closed.
7 And they went behind my back because Ted told
8 them to open it and not to listen to me.

9 Q. So are Faust and Irving the two
10 sergeants in the PAL unit?

11 A. Yes.

12 Q. And who is it that told you Ted told
13 them to do this?

14 A. Both sergeants. Ted Qualli was
15 called to come to the center again. This time
16 when he showed up at the center, he confirmed
17 what the sergeant said. He told me, Lieutenant,
18 like I told you, you are not -- I spoke to the
19 board, and you're not allowed to shut down the
20 center. We would lose a lot of funding if they
21 know that this is not a viable center.

22 And I stated to him that money, the money
23 that they get for the center was not more
24 important than the safety of the kids.

25 And I later found out that they were

1 E. CINTRON

2 telling the funders that supported the center,
3 that it was a viable center, that 150-plus kids
4 attended the center when, in fact, that was not
5 true.

6 Q. The -- so this incident with
7 Wissinoming Center, that occurred, you said,
8 shortly after you joined PAL?

9 A. My first week.

10 Q. And was the center ever formally
11 closed?

12 A. Yes, because -- yeah, it was
13 formally closed when I closed it down. I did
14 discuss the matter with Deputy Commissioner
15 Patterson who agreed with my decision. And the
16 center was to remain shut down until it was
17 properly fixed.

18 Now, Ted Qualli's concern was that it's
19 not a building that is owned by PAL, which is
20 why they didn't want to invest the money in
21 fixing the problem that kept causing the mold
22 to -- the growth of the mold. And I understood
23 that. But they kept trying to convince me to
24 reopen the center, and it was always, like,
25 pressure to reopen up the center. And every

1 E. CINTRON

2 time we talked about it, Ted Qualli would yell
3 and get aggravated because, according to him,
4 he's getting pressure from the board to reopen
5 up that center, even though conditions to fix
6 the center hadn't been resolved.

7 We then had a meeting with the facilities
8 committee who showed up at the PAL center. We
9 coordinated a meeting so that they could be
10 there and see for themselves what I observed.
11 And when they got there, one of the board
12 members agreed that the conditions were
13 deplorable and scolded Ted Qualli in front of
14 me, and told him, It's a shame that you allowed
15 this to go for this long. And from that point
16 on, the center remained closed.

17 Q. Is it your -- as it relates -- so
18 let me back up. So the center closed in the
19 fall of 2016?

20 A. Yes.

21 Q. Is it -- was it one of your -- was
22 it your understanding that one of your job
23 funding -- pardon me -- job responsibilities was
24 to ensure that the PAL facilities were safe?

25 A. Yes.

1 E. CINTRON

2 Q. And that they were adequately
3 funded?

4 A. Yes.

5 Q. And safe for kids to utilize those
6 buildings?

7 A. Yes.

8 Q. And so in terms of the complaints
9 that you were voicing, and the concerns that you
10 had, that was something -- an exercise that you
11 viewed in performing your functions as the
12 commanding officer, correct?

13 A. Yes.

14 Q. Did at any point in -- well, did
15 that complaint about the Wissinoming Center, did
16 that have anything to do with your gender?

17 A. With my gender? Me making the
18 decision? I made the decision because it
19 was unsafe for the kids.

20 Q. Right. No, I -- but what I'm trying
21 to find out is, did that -- so did the complaint
22 have anything to do with your gender?

23 MR. GREEN: Objection.

24 A. I don't know what you're asking.

25 Q. So that complaint, the issue

1 E. CINTRON

2 relating to the Wissinoming PAL Center, that
3 was -- if I understood what you said, that was
4 one of the reasons that you lost your job; is
5 that correct?

6 A. I believe that it was accumulation
7 of different events that I reported. And the
8 board members circumventing me to do things
9 their way, is what caused me to have the
10 stress-related problems that led to PTSD and
11 everything else that I was experiencing while I
12 was at PAL, and now.

13 Q. Right. So the culmination of
14 events, the issues about the Wissinoming PAL
15 Center, that is one of those events; is that
16 correct?

17 A. Yes.

18 Q. And I just want to be clear, the --
19 your -- the issues relating to that building
20 have nothing to do with your gender?

21 A. Well, I believe that when the PAL
22 team that would get together with Ted, and not
23 me, to make decisions was gender-related.

24 Q. But I'm just asking, the complaint
25 about the Wissinoming Center, leave aside the

1 E. CINTRON

2 meetings, that complaint did not -- you were not
3 complaining that you're doing this "because of
4 my gender," did you?

5 A. What I'm saying is their insistence
6 in reopening up that center against my wishes,
7 and them planning to reopen the center without
8 my input, was gender-related, yes.

9 Q. And was it --

10 A. Because they were excluding me as
11 the commanding officer, a woman, from these
12 important decision-making meetings that
13 pertained to Wissinoming.

14 Q. Who excluded you from the meetings?

15 A. When I first arrived at PAL, Bernie
16 Prazenica told me that there is a monthly
17 meeting that I would attend with Ted. And I
18 went to the first meeting, and for the next
19 three years, I never attended the meeting again.
20 I was never invited. I was never included in
21 the email. I was never told what decisions were
22 made at these meetings. All I know is that Ted
23 Qualli would come to me and basically bark
24 orders as to what the board wanted.

25 Q. So you went to one monthly meeting

1 E. CINTRON

2 after you joined, and then never went to any
3 other meetings?

4 A. Which was the second week I was at
5 PAL. After that I never was invited to the
6 meeting, which is the decision-making meeting
7 about everything pertaining to PAL.

8 Q. Let me back up. I want to try to be
9 specific in the questions I want to ask you.

10 So, earlier, I had asked you what adverse
11 actions PAL had taken against you. And I think,
12 if I have this correct, you said that the
13 incident you can identify is that the actions in
14 taking away your job; is that correct?

15 A. Yes. I believe that by not
16 implementing or going against implementing the
17 memorandum of understanding, that would show
18 authority of who is responsible for what, and
19 how this collaboration works, was a direct
20 result of me not being there, because they
21 didn't want to implement it, and they didn't
22 want me to have any authority over PAL matters.

23 MR. GOLDEN: Let's do PAL-4.

24 (Letter is received and marked as
25 Exhibit PAL-4 for identification, as

1 E. CINTRON

2 of this date.)

3 THE VIDEOGRAPHER: The time is
4 1:14. We are now off the record.

5 (A break was taken.)

6 THE VIDEOGRAPHER: The time is
7 1:15. We are now on the record.

8 Q. Ms. Cintron, I've just identified
9 Exhibit PAL-4. Do you recall the first -- have
10 you ever seen this document before today?

11 A. I briefly saw it at Internal
12 Affairs.

13 Q. And do you recall what -- when you
14 say "Internal Affairs," was that a meeting with
15 someone?

16 A. An interview when I was deemed the
17 target, and an internal investigation.

18 Q. And who was conducting that
19 investigation?

20 A. Internal Affairs.

21 Q. And so during that -- was there one
22 meeting or more than one meeting?

23 A. I was interviewed one time, but I
24 think I went up there, like, two or three times
25 to sign paperwork.

1 E. CINTRON

2 Q. And it was during one of those
3 meetings that you first saw this letter?

4 A. Yes, during the interview.

5 Q. Do you know who drafted this letter?

6 A. I know what happened prior to the
7 letter --

8 MR. GREEN: I'm going to object
9 to that particular question. Don't
10 answer it. It says: A Concerned
11 PAL. I mean, that's the only
12 indication of who drafted this at
13 this point.

14 MR. GOLDEN: Well, that letter
15 may say that. I'm just asking if
16 the witness has any firsthand
17 knowledge upon which she can say, I
18 know who drafted it.

19 MR. GREEN: You mean who a
20 Concerned PAL is, the identity of a
21 Concerned PAL?

22 MR. GOLDEN: Okay. I don't want
23 a speaking objection on the record.
24 If you're going to instruct her not
25 to answer my questions then we can

1 E. CINTRON

2 break. I just want to ask a
3 specific and narrow question.

4 MR. GREEN: Do you know who a
5 Concerned PAL is specifically,
6 Ms. Cintron?

7 THE WITNESS: No.

8 Q. So you do not know who wrote this
9 letter?

10 A. No.

11 MR. GOLDEN: That's all the
12 questions I have about that exhibit.

13 We can go off the record.

14 THE VIDEOGRAPHER: The time is
15 1:17. We are now off the record.

16 (A lunch break was taken.)

17 THE VIDEOGRAPHER: The time is
18 2:29. We are now on the record.

19 FURTHER EXAMINATION

20 Q. Ms. Cintron, did you complain to
21 Deputy Commissioner Patterson in 2016 about the
22 conditions at the Wissinoming PAL Center?

23 A. Yes. I reported the incident, the
24 situation to him.

25 Q. Was that done in person or by email

1 E. CINTRON

2 in writing?

3 A. It was both by phone and in person.

4 Q. Can you tell me about everything you
5 said to Detective -- or, pardon me, Deputy
6 Commissioner Patterson about that complaint.

7 A. What complaint?

8 Q. The one about the Wissinoming PAL
9 Center.

10 A. Well, I explained -- informed him
11 everything that I stated to you and my decision
12 why -- as to why I closed down the center. And
13 he agreed that it was a good decision to make
14 because the safety of the kids and the staff
15 comes first.

16 Q. Is there -- are there any documents
17 in which you're aware that say that the decision
18 to close a PAL center would be within the
19 discretion of the commanding officer?

20 A. No. My decision to close was based
21 on the fact that, as the commanding officer, one
22 of my primary jobs is for the safety of the
23 officers and the community.

24 Q. And just so I'm clear, where -- is
25 that your understanding or is there a job

1 E. CINTRON

2 description for the commanding officer?

3 A. That's -- every police officer has
4 the duty to -- to make sure that the safety of
5 self and others comes first.

6 Q. But what I'm asking you is that when
7 you -- as the commanding officer for PAL, are
8 you aware of a written job description for the
9 commanding officer?

10 A. There wasn't one in terms of
11 something in writing, which is why we -- the --
12 Commissioner Ross wanted to implement the
13 memorandum of understanding when Ted Qualli and
14 the board wanted to implement the policies that
15 they attempted to implement.

16 Q. What is your understanding of why
17 that policy wasn't implemented?

18 A. It wasn't implemented because it was
19 one-sided. It completely took all of the
20 authority away from the planning officer to be
21 involved in any decision, and leaving the
22 director and the PAL board to make all
23 decisions.

24 Q. So who told you it was one-sided?

25 A. From reading it. And having

1 E. CINTRON

2 Commissioner Ross review it.

3 Q. Did Commissioner Ross tell you it
4 was one-sided?

5 A. Those are my words. But he agreed
6 that in the -- the writing of this memorandum
7 did not accurately show the collaboration
8 between the City of Philadelphia Police
9 Department and PAL, the nonprofit.

10 Q. So those were his words?

11 A. Yes. In the presence of Ron
12 Prazenica and -- I mean, Ron Rabena, Prazenica,
13 Ted Qualli, Deputy Commissioner Patterson.
14 After -- a chance was given to Captain Hailey to
15 review it before this meeting took place, so it
16 was per Captain Hailey, after careful review of
17 that policy, that the memorandum was to be
18 implemented per Commissioner Ross.

19 Q. Whose idea was it to draft the
20 memorandum of understanding?

21 A. Commissioner Ross.

22 Q. And did he tell you why he thought
23 it should be implemented?

24 A. The explanation I just gave you.

25 Q. So that's what he told you?

1 E. CINTRON

2 A. That's what he said to all of us at
3 the meeting.

4 Q. Earlier, I had asked about the
5 adverse actions that PAL had taken against you,
6 and you had identified being excluded from
7 meetings, and you then identified monthly
8 meetings. Were there -- apart from the monthly
9 meetings, were you excluded from any other
10 meetings?

11 A. I was excluded from every meeting,
12 every decision-making meeting.

13 Q. How do you know what those meetings
14 were involving if you were not in them?

15 A. Because they explained to me that I
16 would be invited to these meetings, and this is
17 where the decisions were made. And I attended
18 the meeting one time, but then was never invited
19 to attend again.

20 Q. So how do you know that any
21 decisions were made at subsequent meetings?

22 A. Because Ted Qualli would come to a
23 general -- you know, our general office meetings
24 and tell us what he was instructed to do at PAL
25 per the board during those meetings.

1 E. CINTRON

2 Q. So it's your testimony that Ted
3 would come --

4 A. Ted would go to the meetings.

5 Q. And then come -- and would come to
6 you and say, This is the decision that was made
7 in that meeting?

8 A. These are the decisions we made at
9 this meeting. This is what we are going to do.

10 Q. How were these meetings scheduled?

11 A. I believe it was monthly or every
12 other month. I'm not sure. But besides that
13 meeting, they would meet other times as well.

14 Q. Well, if you weren't invited, how
15 would you know they were occurring?

16 A. Because Ted would tell me, I'm going
17 to be meeting with Ted [sic], you know, to
18 discuss this issue or that issue. Or it would
19 be put on the calendar.

20 Q. So it would be -- you mean, like an
21 Outlook invite or something like that?

22 A. Well, he would put it on the
23 calendar that he wasn't going to be in the
24 office that day because he was attending these
25 meetings.

1 E. CINTRON

2 Q. If you were aware of the meetings,
3 were you told that you were not invited?

4 A. They told me that I would be getting
5 an Outlook invite every month, which I never
6 did. And when I asked why I wasn't attending
7 these meetings, Ted said they only wanted --

8 (Court reporter clarification.)

9 A. Ted Qualli stated that they only
10 wanted to meet with him.

11 Q. And so when you say -- who do you --
12 who are you referring to by "they"?

13 A. When I would ask him why I was being
14 excluded from the decision-making meetings that
15 they held monthly with Bernie Prazenica and Ron
16 Rabena, he told me they only wanted to meet with
17 him.

18 Q. As the executive director for PAL?

19 A. Yes.

20 Q. And was it meetings with the board
21 or meetings with only Ron and Prazenica?

22 A. It was both. Sometimes they would
23 meet with the board, but the monthly meeting was
24 just with Ron Rabena. I don't know who else
25 would attend because I wasn't there, but the

1 E. CINTRON

2 meeting -- the intention of the meeting was to
3 meet with either the chair or the vice-chair,
4 which was Bernie Prazenica or Ron Rabena, to
5 discuss financials, programming, everything
6 involving PAL.

7 Q. How is it -- is it your opinion that
8 you were excluded from those meetings based upon
9 your national origin?

10 A. Yes.

11 Q. And why -- what facts do you have to
12 inform that belief?

13 A. Well, there was a systemic way of
14 the board and Ted doing things at PAL. And a
15 lot of times when I would be present during
16 regular or general meetings, if they wanted to
17 talk, anything that I brought concerns about or
18 things that needed to be addressed where a
19 decision had to be made, they would always do
20 their sidebar conversations, make the decision,
21 and then, you know, either share with me or not
22 share with me what -- the decisions that were
23 made.

24 Q. So those were concerns that you
25 raised in meetings with Ted?

1 E. CINTRON

2 A. Yes. It was basically all-male
3 meetings. I was never invited to meetings that
4 the commanding officer should be present at, to
5 be able to make good decisions in a unit.

6 Q. So what I want to back up is, you
7 said that there were things that you brought up
8 that needed to be addressed, and then they would
9 do a sidebar?

10 A. If I brought up issues with budget,
11 for instance, a discrepancy in the budget that I
12 found as it pertains to the ordering of
13 trophies, where they claim -- where they stated
14 in a financial statement that PAL has spent an
15 excess of almost 50 in trophies that year, but
16 when I conducted an audit, they only had spent
17 20, and this was something that they had been
18 reporting for the previous five years.

19 When it was brought up in the general
20 meeting, when I brought it up in the general
21 meeting, and someone else mentioned that as
22 well, they said, Well, let's just have sidebars
23 on that. And Ron Rabena said it would be --
24 after this, Bernie and Ted, follow me to my
25 office to have this meeting.

1 E. CINTRON

2 Q. So this was a general meeting, you
3 said?

4 A. Yes.

5 Q. And when did that occur?

6 A. 2016.

7 Q. Was this the only meeting you
8 attended?

9 A. No, I would go to the general
10 meetings. The meetings I wasn't invited to were
11 the decision-making meetings.

12 Q. So is it your testimony that no
13 decisions were made during general meetings?

14 A. No. That was just the reporting
15 from the different committees, the different
16 committees reporting out.

17 Q. So I guess what I'm trying to find
18 out is if no decisions were being made during
19 the general meetings, why are Ted, Bernie, and
20 Ron going, like, to have a sidebar?

21 A. That's something you have to ask
22 them.

23 Q. So you don't know what they were
24 deciding?

25 A. Well, no, they were talking about

1 E. CINTRON

2 the topics that would come up or that I would
3 bring up.

4 Q. And -- but you don't know what they
5 discussed during those sidebars?

6 A. No.

7 Q. I want to again ask -- the exclusion
8 from the meetings, how do you know you were
9 excluded from the meetings based on your
10 national origin?

11 A. I was a female commander in an
12 important unit like PAL, and I was being
13 excluded from attending the meetings that had to
14 do with making decisions under my authority as
15 commanding officer. Yet all of the males that
16 were also involved making decisions would be at
17 these meetings. So it's -- it was -- you know,
18 it was vividly known that it was me who they
19 didn't want in the meeting.

20 Q. So what I want to know is, they
21 didn't want you in the meeting, how do you know
22 that had to do with your national origin?

23 A. I'm the top female commander at PAL
24 responsible for making decisions, responsible
25 for the officers, responsible for the kids,

1 E. CINTRON

2 responsible for safety, the facilities, the
3 centers, everything. But I wasn't invited to
4 the meeting that was all male, five males. So
5 it's not about -- it's about their actions that
6 showed that they didn't want me in there,
7 because they didn't respect me as a female
8 being, an authority. They didn't respect my
9 rank, they didn't respect the fact that I
10 would -- was advocating for the children in the
11 community.

12 Q. So did any of those -- did any of
13 the individuals in those private meetings ever
14 tell you, You are being excluded from this
15 meeting because of your national origin?

16 MR. GREEN: Objection. Asked and
17 answered.

18 Do you understand what the term
19 "national origin" means?

20 THE WITNESS: Yes.

21 MR. GREEN: What does it mean?

22 MS. ULAK: I'm going to object to
23 that.

24 BY MR. GOLDEN:

25 Q. Yeah, go ahead. Do you know what

1 E. CINTRON

2 "national origin" means? I'm just using the
3 term in the complaint. So --

4 A. Yes. My national origin may be
5 Hispanic, may be a woman, my gender being a
6 female. When you have another female like
7 Maureen Rush calling you and telling you, "let
8 the boys handle it," and making the statement,
9 "sit back and collect a check," that implies
10 that, as a female, they don't want me to be
11 involved.

12 Q. Okay. So let me ask the question a
13 different way first.

14 Did any of the individuals in those
15 meetings tell you, you were excluded because you
16 were a woman?

17 A. They didn't verbally say it, but
18 their actions showed it.

19 Q. All right. So I'll come back to the
20 actions. So I just want to confirm that they
21 never verbally told you you were excluded
22 because you were a woman; is that correct?

23 A. Of course not. They didn't say it
24 verbally.

25 Q. Did any of those individuals

1 E. CINTRON

2 verbally tell you you were being excluded from
3 those meetings because you were a Latina?

4 A. Not verbally, but it was -- I had
5 several incidents involving Bernie Prazenica,
6 including an incident that an officer reported,
7 because Bernie Prazenica was in the habit of
8 walking into the room, just like Sullivan, and
9 shaking everyone's hand, but skipping on the
10 minorities, including me.

11 Q. Can you give me --

12 A. When that was brought to his
13 attention, he stated that he's just germaphobic
14 and that he didn't mean it in that way. But
15 every meeting he did the exact same -- I mean,
16 every time there was a group, he would literally
17 walk by, shake people's hands. When he got to a
18 black officer or Hispanic officer, he would
19 literally bypass them and shake the next
20 person's hand who happened to be white.

21 Q. And your testimony is that every
22 meeting you were in with Bernie Prazenica, he
23 did that?

24 A. Ninety percent of the meetings, yes.
25 I had Officer Hampton, who was not aware that I

1 E. CINTRON

2 was experiencing that, make a complaint about
3 the same matter, because he noticed it. It
4 happened at one of the meetings that he
5 attended.

6 Q. So Officer Hatton [sic] submitted a
7 similar complaint?

8 A. Yes.

9 MR. GREEN: Hampton.

10 A. Hampton.

11 Q. Hampton.

12 A. We were at a general board meeting,
13 and several of the officers were invited to talk
14 about their centers, and when he approached the
15 officers, he bypassed Officer Hampton and shook
16 everybody else's hand before him and after him,
17 but would not shake Officer Hampton's hand.
18 Even when Officer Hampton extended his hand to
19 Bernie, Bernie stated he was germaphobic, but
20 the officer then observed him going to the other
21 side of the room and continuing shaking
22 everybody else's hand.

23 Q. So that meeting you recall --

24 A. So he felt offended.

25 Q. Do you recall when that meeting

1 E. CINTRON

2 occurred?

3 A. It was one of the board meetings,
4 like 2017, I believe. I don't remember the year
5 it was.

6 Q. And Officer Hampton, he was the --
7 was he -- was that room -- was he the only
8 African-American in the room?

9 A. No, there were several other
10 African-Americans in the room, but he was the
11 only one that complained that he noticed that
12 him being the only African-American in the
13 circle where he was standing, that Bernie
14 Prazenica bypassed him and continued to shake
15 everybody else's hand, just like he had did to
16 me previously.

17 Q. So is it -- am I fair to understand
18 that Bernie did not shake hands -- that he
19 skipped shaking -- he did not shake hands with
20 any African-American in that room; is that what
21 you're testifying?

22 A. I'm speaking to him, because he
23 reported that to me. No one else reported that
24 to me.

25 Q. Did you personally observe that?

1 E. CINTRON

2 A. I didn't observe it. He told me
3 about it. And he initially went and told Ted
4 about it, What's that all about? you know, he
5 told Ted. And then both of them came up to me,
6 and we were -- and he told me what happened.

7 Q. So what I want to back up and ask --
8 so you also said that the -- the people that
9 excluded you, they didn't respect your rank; is
10 that correct?

11 A. The people -- when you say "people,"
12 are you talking about Bernie Prazenica?

13 Q. Well, you said that -- when I was
14 talking about being excluded from meetings, you
15 said they didn't respect your rank and they
16 didn't respect your advocacy for the kids. And
17 I'm trying to find out who is the "they" that --

18 A. Ted Qualli, Ron Rabena and Bernie
19 Prazenica.

20 Q. And so --

21 A. They were upset because I advocated
22 for the children and reported different things
23 like safety at Wissinoming PAL. And I would,
24 you know, talk to Bernie and Ron about the
25 different issues we were having in terms of

1 E. CINTRON

2 safety in all of the centers. We had issues in
3 a lot of the centers. I'll put it that way.

4 Q. What I want to ask next is, you've
5 given me an example of Officer Hampton
6 complaining about Bernie. What I want to ask
7 is, can you tell me, as it relates to Bernie and
8 you, yourself, things that you witnessed with
9 Bernie? Can you tell me what incidents occurred
10 that you felt you were being discriminated
11 against or unfairly treated because of your
12 gender or being Latina?

13 A. Well, he did the same thing to me as
14 far as not shaking my hand whenever I saw him.

15 And in terms of me being Latina, I just
16 feel that, as a representative of the community
17 I served, I know the names of the community, and
18 I noticed there would be preferential treatment
19 taking place in the centers where white kids
20 attended most, and centers where black and
21 underprivileged children attended, there was a
22 difference in the programs. There was a
23 difference in the funding. There was a
24 difference in the way the facilities looked, you
25 know, and how they would prioritize fixing

1 E. CINTRON

2 certain things in certain centers, but left a
3 center like Wissinoming three years infested
4 with mold. Because that was not the only center
5 that we had issues with.

6 Q. So I need to reframe this question.

7 I understand what you're saying about the
8 PAL centers. What I'm asking you about is what
9 are the things the Bernie Prazenica did to you
10 where you felt he did them because of your
11 gender or national origin.

12 A. I feel that because I was a Latina
13 commander in the unit, by being excluded is
14 enough. Being excluded from the decision-making
15 meetings is enough, because he literally was
16 taking my authority away from me to be able to
17 function properly at my job, to be able to
18 properly do what I needed to do to service the
19 communities I served. And whenever I would
20 bring up issues of inequality, they did nothing
21 about it. They continued with their practices.
22 They continued doing the things that they were
23 doing that was very uneven.

24 You know, I can give you some examples
25 about the programs. You know, we have programs

1 E. CINTRON

2 like the wrestling program at Rizzo PAL. Rizzo
3 PAL is a center that is predominantly all white
4 children, and the Rizzo PAL wrestling team gets
5 to travel, including going to Disney World. And
6 in the centers where there's predominantly black
7 children, where they prefer to play basketball,
8 those officers are not allowed to do travel ball
9 because they don't want the kids to leave the
10 state. So why one group of kids is allowed to
11 leave the state while the other one is being
12 told, No, it's part of the rules, they can't --
13 we can't do it. Even though their biggest
14 endowment is the Josh Harris Foundation, which
15 gives them enough money for a better basketball
16 program.

17 Q. Why is it that the basketball team
18 does not leave the state?

19 A. Because Ted said they are not
20 allowed to leave the state because it's a PAL
21 policy, but yet they let the wrestling team
22 travel out of state.

23 Q. So Ted told you that that was the
24 policy?

25 A. And so did the board at several

1 E. CINTRON

2 meetings when I brought the topic up.

3 Q. And what is the policy? Do you know
4 specifically what it states?

5 A. I always asked them to show me the
6 policy. Maybe we need to amend these policies
7 because they are not fair and equal. And they
8 said, That's just the way it is. They would not
9 give me the opportunity to correct the wrongs
10 because that's what they wanted to do.

11 Q. So you had an opportunity -- there
12 was -- am I correct that you recall an
13 opportunity for the basketball team to travel
14 out of state?

15 A. Yes. The officer submitted
16 different requests at different times because
17 the kids in that neighborhood, it's an outlet
18 for them. Because sometimes the only thing they
19 have is a corner-street basketball court. So
20 that's what they like to do. And they wanted to
21 do travel ball, and they were always told that
22 they can't do it because the kids can't travel.

23 They also wanted to do boxing, which is
24 one of the main sports that propelled PAL when
25 it first opened. And I explained to Ted Qualli

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and the board that the officers had submitted a proposal, which was better than the way they handled boxing back in the day where, this time, instead of being ran by the officers, it would have been a professional boxer. They wouldn't be allowed to actually fight matches. It would just be learning the skill of boxing, you know, just because it's an outlet for the kids. And they were denied doing it because it's too dangerous. But yet wrestling is dangerous. They have an outside organization that runs under the purview of PAL, which is not a PAL program. They are basically allowing an outside entity to run a basketball program and claiming that it's PAL, while PAL is picking up the bill on that.

And the same thing with gymnastics. The girls -- people have gotten hurt wrestling; broken arm, broken leg. Girls have gotten hurt doing gymnastics, again a sport that they play in a predominantly white neighbor -- practice in a predominantly white neighborhood. I would say 90 percent of the girls attending that program is white little girls, or Caucasian -- better

1 E. CINTRON

2 phrasing. They can fall and get hurt at any
3 time, but yet that's acceptable.

4 Again, that's another program that is a
5 program that is not a PAL program, that PAL
6 allows the company to use in a PAL facility,
7 and, you know, pay for equipment and stuff for
8 them, even though it's not an actual PAL
9 program.

10 But if you go on the site, they clearly
11 make it look like it's their PAL-ran -- I'm
12 sorry -- PAL-ran programs, when they are not.
13 They are ran by other people.

14 So they don't let an officer who is
15 certified to do this job and to be around these
16 kids -- kids all the time, take the kids out of
17 state, but they allow someone that's not even
18 part of the organization take the wrestling team
19 to Disney.

20 So these were the things that I would
21 bring up as far as the, you know, inequality in
22 terms of the programs that they were -- we were
23 providing for the kids. And they didn't find
24 anything wrong with it. They would just shut me
25 down and continue their -- the disparity was so

1 E. CINTRON

2 huge that, you know -- but they would not let me
3 fix those problems.

4 Q. So you said that you brought up
5 these issues during meetings?

6 A. Yes.

7 Q. Who were in those meetings?

8 A. Ted Qualli, Bernie Prazenica at the
9 board meetings, the general board meetings. And
10 we were bringing it up in personal
11 conversations, and I was always told to tell
12 officers that they cannot implement these
13 programs.

14 And it's okay if, funding-wise, we can't
15 do certain things. But in the case of
16 basketball, we get the most funding from the
17 Josh Harris Foundation. And, you know, like, if
18 it's not in the budget, that's understandable.
19 But it should not be where one group of kids is
20 allowed to do something that the minority kids
21 are not allowed to do.

22 Q. Is it your testimony there are no
23 minority children on the wrestling team?

24 A. No, I didn't say that. There's a
25 few, but it's a predominantly white PAL center.

1 E. CINTRON

2 Q. Okay. So there are some minority
3 children on the wrestling team?

4 A. Yes.

5 Q. And have you -- just so I'm clear,
6 you have not seen the policy that governs which
7 programs can travel out of state?

8 A. Right. They have none. They keep
9 telling me they want to -- that they were going
10 to establish policies because they were -- the
11 ones that were in place were so outdated, but it
12 was never done. Or at least they never showed
13 them to me.

14 Q. Just you -- just so we're clear,
15 whatever that -- the date, I understand the
16 complaints you are making, but I just want to
17 come back. Bernie Prazenica, what actions did
18 he take, apart from not shaking your hand, that
19 made you believe he was acting towards you
20 because you're a Latina?

21 A. Like I mentioned, excluding me from
22 the meetings that they would not otherwise
23 exclude a male commander, is what they did.
24 Excluding me from making decisions that
25 otherwise they would let a male commander make,

1 E. CINTRON

2 is what they were doing.

3 Q. So would they let a male Latino make
4 that --

5 A. I don't know what they would do, but
6 I know that the previous commander was white,
7 and they didn't exclude him from the meetings.

8 Q. How do you know that?

9 A. Because they told me that Lieutenant
10 Eddis would attend the meetings.

11 (Court reporter clarification.)

12 A. Eddis.

13 Q. E-D-D-I-S.

14 And so when you say "they," you're
15 referring to Ron, Bernie, and Ted?

16 A. Yes, when they told me that I would
17 be attending the same meeting as well, but then
18 was not invited to attend. I was definitely
19 treated different than my male counterparts in
20 the unit.

21 Q. Well, so let me ask a more specific
22 question because then maybe I can focus what I'm
23 asking next.

24 You're saying that you felt treated
25 differently as a female. And because, for

1 E. CINTRON

2 example, it was all men in those meetings. What
3 I'm asking you is, is there anything
4 specifically, not including being a female, are
5 there any instances where you felt Bernie
6 treated you differently because you're a Latina?
7 Excluding your gender. Leave that aside for the
8 moment.

9 A. I just explained that to you.
10 You're treating me differently when you won't do
11 this to a male commander. You're treating me
12 differently when, as the female commander of the
13 unit, you're excluding me from meetings that I
14 should be attending to make decisions.

15 Q. Do you know how long Officer Eddis
16 was the commanding officer for PAL?

17 A. No.

18 Q. And do you know who's the commanding
19 officer before Eddis?

20 A. No, I don't recall.

21 Q. So how do you know that Commanding
22 Officer Eddis wasn't excluded from any of the
23 meetings?

24 A. I don't know if he was excluded from
25 any of the meetings, but according to Ted, he

1 E. CINTRON

2 attended the monthly meetings with Eddis when
3 Eddis was there.

4 Q. So your understanding of his
5 attendance is from Ted?

6 A. And Bernie Prazenica and Ron, when
7 they told me that -- when I came to PAL, that I
8 would attend the same meetings, and it's
9 attended with Ted on a monthly basis to talk
10 about the problems and where they would make the
11 decisions for PAL. So I was told that I would
12 be invited, just like Lieutenant Eddis would be
13 invited -- was attending those meetings, but I
14 wasn't.

15 Q. Just so I'm clear, you have no
16 personal knowledge from Commanding Officer
17 Eddis, what meetings he attended or did not; is
18 that correct?

19 A. My knowledge came from Bernie
20 Prazenica and Ron Rabena.

21 Q. Apart from being excluded from the
22 meetings, and Bernie not shaking your hand, what
23 other incidents can you identify where you felt
24 you were treated differently because of being
25 Latina or a female, by PAL?

1 E. CINTRON

2 A. That -- can you repeat that
3 question? Because it seems like it's the same
4 question.

5 Q. Well, so sure. Let me -- so let
6 me -- I'll try to explain it this way: What I'm
7 trying to find out from you is instances where
8 you felt you were treated differently because
9 you are either Latina or a female. And we have
10 talked about a couple. Right? You said, I was
11 excluded from the meetings, and that Bernie did
12 not shake your hand.

13 What I'm trying to find out, are there any
14 other things that you can say: This
15 event occurred, and I felt treated differently
16 because I am either a Latina or a female?

17 A. Yes. As I mentioned earlier, when
18 Deputy Commissioner Sullivan enters an office
19 where Bernie Prazenica and Ron Rabena is
20 standing, along with -- I mean, Ted Qualli was
21 not there. It was Bernie Prazenica and Ron
22 Rabena, were standing, and I'm being told what
23 she has to say doesn't matter, and I'm being
24 flagged, something that they would not do to a
25 male commander, and you laugh, you're condoning

1 E. CINTRON

2 that behavior. You're condoning the behavior
3 when I tell you that the PAL headquarters
4 civilian staff are constantly saying racial
5 jokes and innuendos, and you think it's funny,
6 and you tell me that it's okay for them to say
7 whatever they want to say because they can say
8 whatever they want to say. And when you don't
9 take action to rectify that behavior in your
10 employees, then you're condoning it.

11 And part of that -- being exposed to that
12 was me, as a commanding officer, when people
13 make comments like, "your officer is retarded,"
14 and things like that, that they were saying at
15 meetings.

16 Q. Who is the "they"?

17 A. Or they would request specific
18 officers to go to certain meetings because of
19 their color.

20 Q. Do you feel that any of that conduct
21 was targeted towards you?

22 A. I believe that they were sending
23 a -- the wrong message, that being inclusive is
24 not important in the community that we serve,
25 that it's okay to allow women to feel like they

1 E. CINTRON

2 are less than what they are, even though they
3 worked just as hard as men to achieve where they
4 are at. And I wasn't treated as my male
5 counterpart by Bernie and Ron, or Ted for
6 that matter.

7 Q. Who is the male counterpart that
8 you're identifying?

9 A. I'm talking about anybody in the
10 room. If they came in, they spoke to the men,
11 they didn't speak to me. Bernie wouldn't even
12 speak to me and not even shake my hand or
13 acknowledge me. They wouldn't invite me to the
14 meetings to -- for me to get information about
15 the programs I'm supposed to run or make a
16 decision on the funding, or help with the needs
17 of PAL in the community. Like, I was totally
18 excluded. What other reason would it be other
19 than to exclude me because I am a woman? And
20 they made it a point to send another woman to
21 tell me to stay out of it and let the men run
22 it.

23 Q. And that's what Maureen Rush told
24 you?

25 A. Yes, as per her, it was the message

1 E. CINTRON

2 she was relaying from Bernie and Ron Rabena.

3 Q. Did Bernie ever tell you that they
4 sent Maureen Rush to deliver that message to
5 you?

6 A. No. She told me. She confirmed it.

7 Q. Did Ron or Ted ever tell you that
8 they sent her to deliver the message?

9 A. No. But Ted was the one that
10 delivered the message under false pretense that
11 I was meeting with her for programs.

12 (Email is received and marked as
13 Exhibit PAL-5 for identification, as
14 of this date.)

15 Q. This, Ms. Cintron, if you -- this
16 was produced separately, but I believe it's
17 related to PAL-3, looks to be -- they have the
18 same subject matter and time frame.

19 A. Yes.

20 Q. And in PAL-3, it says: Does the
21 time on 10/24 work for you? This was a date
22 proposed by Ms. Faust. And in PAL-5, Ted
23 responds to you -- PAL-5 is the one I just gave
24 you.

25 A. This one?

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2 Q. Yup. If you look in the middle. It
3 says L-T. I assume -- it's my interpretation
4 he's referring to you as Lieutenant. He says:
5 Unfortunately, that time does not work for me as
6 I have a meeting in Bala Cynwyd.

7 And so was it your understanding that Ted
8 would be participating in a meeting with you and
9 Maureen Rush?

10 A. No.

11 Q. Is it your opinion that you're
12 excluded from meetings, and Bernie wouldn't
13 shake your hand, and the other things you just
14 listed -- it's your opinion that that was due to
15 your being Latina and a woman, correct?

16 A. Yes.

17 Q. And so your conclusions are based
18 upon your interpretation and belief?

19 A. No, based on my observations.

20 Q. And so in those meetings, is it your
21 testimony that Bernie would refuse to shake the
22 woman -- the hand of any woman?

23 A. I would see him shake other women's
24 hands.

25 Q. Is there anything else where you can

1 E. CINTRON

2 recall Ted, Bernie, or Ron, anyone at PAL
3 treating you unfairly because it was, in your
4 opinion, due to your being Latina or female?

5 A. Yes.

6 Q. What's that?

7 A. When we were returning from a
8 meeting, Ted explained that he was upset about
9 the memorandum of understanding. I believe that
10 was the same meeting where we had brought
11 Commissioner Ross about the memorandum of
12 understanding, and while we were riding back in
13 the car, he stated, You're -- the only reason
14 why you're at PAL is because the commissioner
15 wanted you to represent the community we serve.
16 He said, But you're meant to be seen, not heard.

17 And then he said, What the commissioner
18 wants doesn't matter because PAL runs -- runs
19 the unit. He said, And the board is the final
20 decision-makers. He was talking about the board
21 being the decision-makers.

22 Q. Do you know who the commanding
23 officer of PAL is now?

24 A. No.

25 Q. Do you know who the commanding

1 E. CINTRON

2 officer of PAL was immediately after you left?

3 A. I don't recall the name, but I do
4 know that Commissioner Ross has selected a black
5 male to -- captain to take my place once I left.
6 After that, they put a white female, Captain
7 Campbell, who is now Deputy Commissioner
8 Campbell, which was Sullivan's first choice to
9 be at PAL when he tried to eliminate me, get rid
10 of me when he came to PAL.

11 Q. That was Deputy Commissioner
12 Campbell?

13 A. She's currently the Deputy
14 Commissioner Campbell.

15 Q. And who -- was it your testimony
16 that Sullivan hired her to be the -- or promoted
17 her, chose her to be the --

18 A. No, I'm not saying that. What I'm
19 saying is that when Sullivan first got to PAL,
20 one, he requested to overseeing the Police
21 Athletic League unit. He immediately started
22 to -- went to Commissioner Ross, requesting that
23 I be replaced. He went to Commissioner
24 Patterson to oversee the unit voluntarily. Then
25 he went to Commissioner Ross and tried to get me

1 E. CINTRON

2 removed without cause and bring in another
3 commander.

4 And once Commissioner Ross left, they
5 placed Captain Campbell in my position. Someone
6 that Commissioner Sullivan told not to speak to
7 me in reference to a PAL matter, in reference to
8 the grand opening of the 26th District. She was
9 an ally working with me to get the center open.
10 And after, the community sent a letter to
11 Councilwoman Maria Quinones, that PAL had
12 received over \$250,000 to open a center in the
13 26th District three years prior, and had not
14 utilized the money for that purpose.

15 Because she was the captain in the 26th
16 District, me and her were working together to open
17 up that center, to get that center working, up and
18 running, because after I located a location to get
19 the center up and running, some repairs needed to
20 be made before we could open the doors, for which
21 Ted Qualli and the board did not want to spend the
22 money to make the repairs, so that the center could
23 be safe before we opened up the doors.

24 I went and talked to someone I knew in the
25 painters union, who donated over \$30,000 of

1 E. CINTRON

2 paint to get the gym painted, and labor to get
3 work done as far as all the painting was
4 concerned.

5 I was concerned because there was a
6 bathroom that was a unisex bathroom by the doors
7 that led to the outside alley, a door that the
8 building owners wanted to keep open for safety
9 reasons. But it was known that there was -- the
10 homeless people would sneak into the building
11 through that same door to sleep in the building,
12 so it would have been unsafe for the kids to
13 have to use that bathroom, away from the
14 officers' view. And I requested that the
15 bathroom be either relocated or some form of
16 door to -- that we can secure that door somehow.
17 And request that an officer for -- an office for
18 the officer, as well as a game -- a computer
19 room for the kids. And they didn't want to
20 spend the money to get those corrections done
21 before we opened up the center, even though they
22 had that endowment that was given to them for
23 that purpose.

24 Q. Who is the "they"? Is that Ron,
25 Bernie, and Ted?

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2 A. The Police Athletic League was given
3 over \$250,000 for the purpose of opening a
4 center in the 26th District three years prior.
5 And I was familiar with this because they
6 originally approached me. Captain Cappy had
7 called me because at the time I was the director
8 or the coordinator of the Police Explorers
9 program at the 25th District. And he called me.
10 He said, Hey, we have a donor that wants to give
11 money to the Police Explorers and to PAL. And I
12 referred them to give that money to -- to go
13 through Finance to give that money. And they
14 referred the family to PAL, to donate the
15 portion they wanted to make -- to donate to PAL
16 directly. And that was three years prior.
17 That's why I had knowledge of it, and prior to
18 being the commanding officer at PAL.

19 And there was a letter sent to the
20 councilwoman in reference to PAL not taking
21 action to open up that center. Because Captain
22 Campbell and I were trying to get a center
23 opened, we were trying to work with Ted Qualli,
24 Bernie Prazenica, and Ron to get these repairs
25 done to get the center opened, and it became a

1 E. CINTRON

2 to-do because they didn't want to spend the
3 money fixing up the things that needed to be
4 fixed.

5 Q. You said that when Deputy
6 Commissioner Sullivan came in, he tried to get
7 you removed without cause and bring in another
8 commander. Who was that commander?

9 A. I don't know, but I believe it was
10 Captain Campbell, because shortly after that, he
11 called Captain Campbell and told her not to
12 speak to me, and not to get involved in the
13 situation involving the 26th District grand
14 opening.

15 I know this because I spoke to her after a
16 meeting that we had at the 26th District, and
17 she told me, I got to stay away from you. I
18 just got reamed down. The commissioner doesn't
19 want me to talk to you. And I'm just going to
20 stay out of it.

21 He then called the sergeants to his
22 office, as well, and he was basically telling
23 people to stay out of -- basically to isolate me
24 and not talk to me, and siding with the board on
25 these matters.

1 E. CINTRON

2 Q. Captain Campbell is a female; is
3 that correct?

4 A. Yes.

5 Q. And she's Caucasian?

6 A. Yes.

7 Q. Are you aware of anyone at PAL
8 trying to have you replaced?

9 A. Anyone at PAL trying to have me
10 replaced?

11 Q. Right. So you said that Deputy
12 Commissioner Sullivan had wanted to have you
13 removed. Is there anyone at PAL that wanted to
14 have you removed?

15 A. Ted Qualli, Bernie, and Ron.

16 Q. And how do you know that?

17 A. Because they were going to
18 Commissioner Sullivan and advocating for changes
19 to be made because of me speaking up, and
20 talking about the problems, you know, the
21 deplorable conditions at the centers.

22 Q. How do you know that they went to
23 Sullivan and asked for that?

24 A. Prior to Sullivan coming over to
25 PAL, we were at the 25th District PAL for an

1 E. CINTRON

2 event, and Ron Rabena and Ted -- Ron Rabena and
3 Bernie Prazenica were speaking and they knew,
4 before I knew, that Sullivan was going to be in
5 charge of PAL. Bernie made a comment and said,
6 How about that? We are getting our boy to be
7 Deputy Commissioner and requesting to oversee
8 PAL. And he mentioned that he hopes it happens
9 because at least Sullivan would look out in
10 their best interest.

11 Q. What I want to know, though, is how
12 do you know that they, the three of them asked
13 Sullivan to remove you? Did any of them tell
14 you that they asked for that?

15 A. They never asked for that. But once
16 Sullivan was in his position as deputy
17 commissioner, he was abusing his authority as a
18 commissioner, and instead of speaking to me on
19 PAL matters, he was going directly to the board
20 and speaking with them. And then all of a
21 sudden, I'm being -- I'm the subject of an
22 investigation for something I reported.

23 Q. Okay. What I'm trying to ask you is
24 not that question. It is: Did -- do you have
25 firsthand knowledge that Bernie, Ted, or Ron

1 E. CINTRON

2 asked Sullivan to have you removed?

3 A. Yes, because when DC Sullivan
4 attempted to have me removed, and I had a
5 conversation with him in the office, he
6 mentioned, You know, the board is not happy with
7 you. And they don't want you there. They want
8 you removed.

9 And he -- but he never mentioned that he
10 tried to get me removed. I received that
11 information from Patterson when he informed me
12 that Sullivan was going to take over PAL.

13 Q. So I want to isolate a sentence.
14 Sullivan told you that the PAL board was, quote,
15 not happy with you, correct?

16 A. Yes.

17 Q. Leave that phrase aside for a
18 second. Did Sullivan ever tell you that Bernie,
19 Ted, or Ron specifically wanted you removed?

20 A. Yes. He said -- he said, You know,
21 they don't want you there.

22 Q. Okay. When did he say that?

23 A. At the -- during the conversation
24 that I had with him. And I didn't even know
25 about the fact that he already had actually went

1 E. CINTRON

2 and tried to get me removed.

3 Q. And did he ever tell you that they
4 don't want you there because you're Latina?

5 A. They didn't say that.

6 Q. Did he ever --

7 A. I mean, he didn't say that to me.
8 He just said they don't want me there -- They
9 don't want you there.

10 Q. And did he ever tell you that they
11 didn't want you there because of your gender?

12 A. He never said that, either.

13 Q. Now, you mentioned that the -- you
14 were speaking up about the deplorable conditions
15 in some of these facilities; is that correct?

16 A. Yes.

17 Q. And is it your understanding that
18 that's why the board was not happy with you?

19 A. They were not happy because I would
20 ask them to get some of these things resolved.
21 And a lot of times when I would try to get
22 things resolved, like getting some emergency
23 situations taken care of, I was put through a
24 loop as to who is going to approve for an
25 electrical outlet that's sparking fire, to get

1 E. CINTRON

2 fixed, for two weeks. And when I tried to order
3 an electrician to get it fixed, Sunny Lee, who
4 is the chief financial officer, said Oh, I'm
5 going to go look at it. And I'm like, Are you
6 an electrician? Because if you're not, what we
7 need is an electrician to go fix an outlet
8 that's sparking fire.

9 So they would put all of these barriers,
10 is what they were doing, for me to be able to do
11 my job effectively, when it came to trying to
12 make the center safe.

13 Q. So they were frustrated with your
14 efforts to make the centers operate safely?

15 A. They were -- I wouldn't say that
16 they were -- my efforts to make the centers
17 safely. They were frustrated about the finances
18 behind -- or having to spend money to get some
19 of these things fixed. And had their -- and, in
20 my opinion, had their priorities in the wrong
21 place.

22 When I was trying to get an electrician to
23 fix a faulty -- faulty wires at the center, that
24 the officers couldn't use because it was
25 sparking -- sparking, Ted Qualli said, Oh, they

1 E. CINTRON

2 are not -- maintenance is not going to go over
3 there. They have to paint a wall at
4 headquarters.

5 So, to me, it was a power struggle on
6 Ted's behalf, that if I said, Let's go fix an
7 outlet, Ted was saying, No, I need them to paint
8 a wall, because we are getting some visitors at
9 headquarters this week.

10 So, to me, that's misplacement. He's
11 abusing his authority, one, and misplacing where
12 the -- the needs are real, if that makes any
13 sense.

14 Q. Did anyone from PAL -- let me ask
15 this. Did Ron Rabena -- did Ron, Ted, or Bernie
16 have the authority to remove you as commanding
17 officer?

18 A. No.

19 Q. Did any of them --

20 A. They have a say, because just like
21 they could recommend who comes in, they
22 recommend who leaves.

23 Q. Are you aware of any of those three
24 ever recommending that you be removed?

25 A. All I know is the conversation that

1 E. CINTRON

2 I mentioned to you that I had with Sullivan.

3 Q. Okay. Did any of them, directly to
4 you, encourage you to resign your post?

5 A. Sullivan -- when I spoke to
6 Sullivan, he asked me why won't I just pick
7 another unit and go. Like, he offered me to
8 pick another unit.

9 Q. So then Bernie, Ted, or Ron never
10 had a -- they never encouraged you to leave?

11 A. No. They would go through DC
12 Sullivan to address me on those matters.

13 Q. Do you know that they went to DC
14 Sullivan to have you leave?

15 A. Yes. According to Sullivan, he
16 said, I spoke with the board. They don't want
17 you there. But Commissioner Ross doesn't want
18 to move you.

19 Q. And do you -- can you give me an
20 approximation of when that conversation with DC
21 Sullivan occurred?

22 A. All of this began as soon as he got
23 there. He got there, and he was trying to get
24 rid of me. He was trying to circumvent me. He
25 isolated me by telling people not to speak to

1 E. CINTRON

2 me. He began doing a lot of things to take my
3 workload off. He was reassigning my jobs or my
4 initiatives. And he was utilizing my resources
5 to enhance his own foundation.

6 Q. What evidence do you have that he
7 used PAL resources to enhance his own
8 foundations?

9 A. It took me about a year to finally
10 start the Police Blue Cadets Drum Line. It's
11 public knowledge, because it's all over the
12 media, that they performed their first, you
13 know, I guess, their first time at the PAL
14 dinner. And at that dinner, my -- Deputy
15 Commissioner Sullivan spoke to my Blue Cadets
16 Drum Line director. Afterwards, the next day,
17 Sullivan called me and was asking me where does
18 the officer, the director of the drum line work.
19 And he asked me for the officer's information.
20 He then contacted that officer. The officer
21 stopped coming to PAL to do his weekly classes
22 with the PAL kids, stating that he was busy and
23 that he had gotten hurt at work, and he couldn't
24 practice with the kids no more.

25 The next thing I know, the officer is on

1 E. CINTRON

2 the news with Sullivan, because Sullivan started
3 his own drum line for his organization, and they
4 debuted at the Irish Day Parade. And the person
5 that was teaching his kids was my director that
6 he stole from me, basically. So, as a result, I
7 couldn't find someone else to replace the
8 officer, and we couldn't continue with the
9 program.

10 When I saw Sullivan, not knowing that he
11 was utilizing my director to form his own drum
12 line, I asked him, Hey, my drum line director
13 said he's hurt, and he can't teach kids how
14 to -- you know, like, continue teaching the
15 kids. And I said, Would it be possible if I
16 could send a citywide message asking any other
17 officer if they will volunteer to teach the
18 kids -- teach kids to replace this other
19 officer? And at no time did Sullivan tell me
20 that he was utilizing my director for his own --
21 building his own drum line. And he said to me,
22 I don't care, do it if you want. Like, he
23 didn't even care that the drum line was falling
24 apart, as someone that's supposed to be
25 responsible of the PAL unit. But at the same

1 E. CINTRON

2 time it was no surprise to him that I didn't
3 have a director.

4 And sure enough, two weeks later, they are
5 all over the news that Sullivan started a new
6 drum line program that mimicked my program, but
7 for his foundation.

8 Q. Did DC Sullivan have the authority
9 to remove you from your post?

10 A. No, because I was chosen by
11 Commissioner Ross.

12 Q. So --

13 A. He can make recommendations, if he
14 wanted to.

15 Q. So that's the same then, Sullivan
16 can make recommendations, but it is ultimately
17 up to Ross to decide to remove you from the
18 post?

19 A. Yes, because my position, I was
20 appointed to that position by Commissioner Ross.
21 So he, in essence, selected me for that
22 position. So Sullivan would have gone -- and
23 did go to him to try and get me removed.

24 Q. And how do you know that Sullivan
25 went and tried to have you removed?

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2 A. Because I spoke to DC Patterson when
3 he instructed me that PAL -- that Sullivan
4 requested to oversee PAL. And he informed him.

5 Q. So Sullivan wanted to oversee PAL,
6 but --

7 A. And he wanted to bring someone of
8 his choosing to PAL. Not just my position, but
9 he also tried to bring someone -- his own wife
10 to work at police headquarters near him.

11 Q. And the individual that Sullivan
12 wanted to replace you with was a female captain,
13 correct?

14 A. I'm not sure. But when I spoke to
15 Campbell later on, and she told me that he told
16 her to stay out of it and not speak to me, she
17 also mentioned that, you know, that it was
18 better for her not to get involved, and that he
19 will remember that she -- you know, if she
20 stayed away. She says, So I'm just going to
21 stay away because I don't want no more problems.
22 Because I don't know what she interpreted by
23 that.

24 MR. GREEN: Excuse me. Can we
25 take a break?

1 E. CINTRON

2 MR. GOLDEN: Sure.

3 THE VIDEOGRAPHER: The time is
4 3:32. We are now off the record.

5 (A break was taken.)

6 (Family Leave of Absence Request
7 is received and marked as Exhibit
8 PAL-6 for identification, as of this
9 date.)

10 THE VIDEOGRAPHER: Time is 3:45.
11 We are now on the record.

12 Q. Ms. Cintron, I just introduced
13 Exhibit PAL-6. Do you recognize -- is that your
14 signature on that document?

15 A. Yes.

16 Q. And this is a request for leave, for
17 FMLA leave starting on February 1st, 2018; is
18 that correct?

19 A. Yes.

20 Q. And to whom did you submit this
21 FMLA -- when I use the term FMLA, you understand
22 that I mean the Family Medical Leave Act?

23 A. Yes.

24 Q. Do you recall to whom you submitted
25 your FMLA leave request?

1 E. CINTRON

2 A. According to the policy, you submit
3 it to Personnel. Once they review it, they send
4 it to your supervisor.

5 Q. And so was that the -- you said --

6 A. So this was forwarded to Deputy
7 Commissioner Sullivan for approval.

8 Q. And so it was -- was it submitted --
9 it was submitted. Do you recall, did you submit
10 this in writing, like in person or by email? Do
11 you recall how you submitted it?

12 A. Oh, you have to take it in person.

13 Q. And to whom did you turn it in to?
14 Do you remember the name?

15 A. No. You just drop it off, and they
16 assign it to someone. And then when it goes
17 through the chain of command, they will notify
18 you if it got approved or denied.

19 Q. And so this was something you
20 submitted to the personnel unit within the city?

21 A. According to policy, yes.

22 Q. Did you have to submit this to
23 anyone with PAL?

24 A. No.

25 Q. And was this request for FMLA leave

1 E. CINTRON

2 approved -- sorry, was the request for FMLA
3 leave, was it approved?

4 A. Yes.

5 Q. And do you know who was involved in
6 the decision to approve it?

7 A. Deputy Commissioner Sullivan.

8 Q. Anyone else that you know was
9 involved?

10 A. No. I believe that's the highest
11 level it has to go.

12 Q. Do you know if anybody from PAL was
13 involved in that process?

14 A. No.

15 Q. And you began your FMLA leave in
16 February of 2018; does that sound accurate?

17 A. Yes.

18 Q. And you were on leave for
19 approximately one year; is that correct?

20 A. Yes.

21 (Request to Separate is received
22 and marked as Exhibit PAL-7 for
23 identification, as of this date.)

24 Q. Ms. Cintron, is that your signature
25 at the bottom of that page or halfway through

1 E. CINTRON

2 that form?

3 A. Yes.

4 Q. And is this -- the stated basis
5 is -- the reason for requesting separation is
6 retirement; is that accurate?

7 A. It was forced retirement, because I
8 exhausted all my family leave. And when
9 I requested for an extension to go on unpaid
10 status, Deputy Commissioner Coulter denied it.

11 Q. And how do you know that DC Coulter
12 denied it?

13 A. Because when I went to Internal
14 Affairs to do my exit interview, and I spoke to
15 Deputy Commissioner Wimberly, she informed me
16 that I had the right to extend my leave to an
17 unpaid status. And she called Deputy
18 Commissioner Coulter while I was there, and she
19 went to her office, and then she came back and
20 told me that Deputy Commissioner Coulter denied
21 the request.

22 She was actually encouraging me, Don't let
23 this -- don't let them do this to you, like,
24 don't give up on your career. I'm like, I don't
25 want to give up on my career, but I'm too ill to

1 E. CINTRON

2 be at work. You know, like my PTSD, I can't --
3 they are not allowing me to go to work, and I'm
4 not physically capable to go to work right now
5 because of my medical condition.

6 Q. Did -- DC Coulter, that is a city
7 employee; is that correct?

8 A. She's a deputy commissioner. She
9 was. I think she's not -- I'm not sure if she's
10 here or not.

11 Q. At that time --

12 A. At that time.

13 Q. -- she was a city employee?

14 A. Yes.

15 Q. Did anyone from PAL, to your
16 knowledge, have involvement in the rejection of
17 your request for additional leave?

18 A. I don't know. They wouldn't have
19 the final say-so. The deputy makes the
20 determination.

21 Q. And when you say it was a forced
22 retirement, was it because you were not able to
23 return to work at that point?

24 A. I could have went on unpaid status,
25 but that was denied. So since medically I was

1 E. CINTRON

2 still dealing with my posttraumatic distress
3 disorder and conditions, I couldn't come back to
4 work because of how I was feeling. And in
5 addition to that, my medical wouldn't approve
6 for me to come back to work.

7 Q. You mean the medical providers
8 wouldn't clear your return?

9 A. Yes. The person that I was seeing
10 at Philmont.

11 Q. Do you recall if there is -- like,
12 do you recall any specific notes or documents
13 that said you were not clear to return to work?

14 A. What you mean, "not clear"?

15 Q. So let me back up. When you go out
16 on FMLA leave, not always, but you may say, I
17 got a note from my doctor that says I need to
18 take a certain amount of time off. What I'm
19 asking you is, did anyone from Philmont give you
20 a letter at that time saying you were not yet
21 able to return to work?

22 A. No. She -- I think she documented
23 it on my records, but I don't know what she
24 documented, but she expressed to me that given
25 my medical condition and the fact that I was

1 E. CINTRON

2 still having a lot of problems, that she does
3 not recommend for me to go back to work and to
4 be exposed to the same unfavorable conditions.

5 MR. GREEN: Off the record one
6 second.

7 THE VIDEOGRAPHER: The time is
8 3:52. We are now off the record.

9 (Whereupon, an off-the-record
10 discussion was held.)

11 THE VIDEOGRAPHER: The time is
12 3:53. We are now on the record.

13 Q. When you said that you couldn't
14 return to work because of the unfavorable
15 conditions, what were those -- what are
16 those unfavorable conditions?

17 A. Everything that I stated before. I
18 could not go back to work to an environment that
19 was hostile and where I was being isolated and
20 being harassed and not know what -- what was
21 going to happen to me, given the fact that, you
22 know, my boss, the Deputy Commissioner Sullivan,
23 was siding with the board because of the
24 personal relationship they have of working
25 together on Sullivan's nonprofit, which was a

1 E. CINTRON

2 conflict of interest. Working with PAL, someone
3 that does fundraising for you and donates over
4 \$400,000 a year to your nonprofit organization.
5 So he always was siding with the board because
6 he wanted to stay in favor of the board.

7 Ron Rabena does the biggest fundraiser for
8 the Heroes Foundation, and part of that money
9 goes to -- have been -- Deputy Commissioner
10 Sullivan's foundation has been the recipient of
11 that money, have gotten funded by that fund or
12 charitable organization.

13 Q. Are you saying that PAL itself, as
14 an organization, donates \$400,000 to DC
15 Sullivan's charity?

16 A. No. What I'm saying is that Ron
17 Rabena, a board member, runs a Heroes
18 Scholarship Fund, and they donate to the police
19 department fallen officers, as well as
20 Sullivan's personal own foundation, nonprofit
21 foundation. So Sullivan benefits from the money
22 that he receives for his foundation to move his
23 foundation forward by money that is being raised
24 by Ron Rabena.

25 Q. Do you know the name of DC

1 E. CINTRON

2 Sullivan's organization? Do you know what the
3 name of it is?

4 A. It's Children's Charitable
5 Foundation. He's also in charge of the Heroes
6 Scholarship, the heroes run where they do the
7 bike runs. And PAL helps them with facilitating
8 that run to the Atlantic City area, by allowing
9 Sullivan to utilize the PAL vans to transport
10 and to be used for that purpose that is not a
11 PAL event.

12 Q. Well, PAL is a charitable
13 organization, correct?

14 A. PAL is a children's --

15 Q. A charitable organization.

16 A. PAL?

17 Q. Yes.

18 A. PAL is a nonprofit organization to
19 help children. I don't believe they are
20 supposed to be donating forward donations that
21 are given to them, but what I'm referring to is
22 to the heroes dinner that is ran and operated by
23 Ron Rabena, PAL board member.

24 Q. Well, my question is, if PAL wants
25 to allow it's vans to be used for another

1 E. CINTRON

2 charity, why would you say that that's -- you
3 know, something was wrong with that?

4 A. Well, what I'm saying is that the
5 PALs -- are bought for the purpose of
6 transporting kids and families during PAL
7 events. And Sullivan benefits from that because
8 he didn't have to pay to have this big event
9 every year because he utilizes the PAL vans.

10 Q. Well, if the PAL vans aren't being
11 used in -- for PAL events at that time, is there
12 anything that would prevent them from being used
13 by DC Sullivan?

14 A. Well, in my opinion, if the vans are
15 being bought for the use of transporting
16 children, the wear and tear is at the cost of
17 PAL, and that's less money that they can put
18 into programs because the vans are not being
19 used only internally.

20 Q. Well, I hear you say that that's
21 your opinion.

22 A. So it's an additional cost. What
23 I'm saying is it's an additional cost to PAL to
24 maintain those vans on a yearly basis, when that
25 money can be directed towards the programs for

1 E. CINTRON

2 the kids.

3 Q. Are you --

4 A. Instead of a deputy commissioner
5 taking advantage of his authority to ask to
6 borrow vans to run his own foundations or his
7 own events.

8 Q. Are you aware of any provisions in
9 PAL's, you know, articles of incorporation or so
10 on, that would prevent the use of the vans by DC
11 Sullivan's charity?

12 A. Well, their -- I don't know what's
13 in their documents, but I know that Ted Qualli
14 expressed numerous times that the vans should
15 not be used for anything other than transporting
16 kids to and from events. But yet they lend the
17 vans to Deputy Commissioner Sullivan for his
18 personal foundation.

19 Q. And how did it come up with Ted that
20 the vans should only be used for transporting
21 kids?

22 A. We spoke about it several times, and
23 his thought on it is, It's the deputy, I'm not
24 going to say no. But the problem is not the
25 vans itself that I'm referring to. The problem

1 E. CINTRON

2 is the fact that Sullivan is abusing his
3 authority by being -- and it's a conflict
4 of interest for him to be in charge of PAL when
5 he himself has a reason to side with the board
6 and be in good standing with the board, even if
7 that meant isolating me, because I made these
8 complaints because it's not beneficial to him
9 for him to lose funding for his charitable
10 organization. It's a conflict of interest.
11 He's not going to side with me when someone from
12 the board is giving him -- you know, is
13 selecting him to receive some of the funds that
14 they get from that fundraiser.

15 Q. How do you know, or who from the
16 board decides what money to give to --

17 A. I don't know. But I do know that
18 Ron Rabena brags about it to me and said, Oh --
19 just threw a paper on my desk when they were
20 planning the event, and one day that he was at
21 headquarters, and he threw it, and he said, Oh,
22 this is where we give money to Sullivan's
23 foundation -- before Sullivan came to PAL.

24 Q. Do you know if DC Sullivan's charity
25 compensates PAL in any way for its use of the

1 E. CINTRON

2 vans?

3 A. No, they don't.

4 Q. How do you know that they don't?

5 A. Because, as the commanding officer,
6 I had to review the use of the vehicles, and any
7 reimbursement will go through me so that I could
8 submit it to Finance, and I never saw any
9 reimbursement.

10 Q. When do the -- when does this event
11 occur? It's an annual event, correct?

12 A. They do one annual event, but they
13 also do other events as well.

14 Q. And do you know when that annual
15 event occurs?

16 A. I'm not sure. I don't remember.

17 Q. And so, in your recollection, there
18 was never a time where you saw PAL being paid
19 for the use of those vans; is that correct?

20 A. No.

21 Q. Is it possible other -- someone else
22 could have handled that payment?

23 A. No one handled that payment.

24 Q. Who did -- did PAL have a treasurer?

25 A. A treasurer. We have a -- they had

1 E. CINTRON

2 a chief financial officer.

3 Q. And who was that?

4 A. Sunny Lee.

5 Q. What are Sunny Lee's
6 responsibilities?

7 A. Well, they sometimes complained
8 that, because of wear and tear, that the van
9 shouldn't be lent out. And they mentioned how
10 Sullivan would borrow the vans and use them for
11 his events. But other than that, that's the
12 only thing that I heard them talk about.

13 Q. When you say "they," who's the
14 "they"?

15 A. Like Sunny Lee, Ted Qualli.

16 Q. And so Sunny and Ted were
17 complaining about Sullivan using the vans?

18 A. It depends on the day. Sometimes
19 they would complain that he wanted to borrow
20 them, but they were -- willingly let them -- let
21 him use it.

22 Q. Did you have a vehicle that was
23 provided to you by PAL when you were the
24 commanding officer?

25 A. Yes.

1 E. CINTRON

2 Q. Did you ever use it for any
3 non-PAL-related work?

4 A. No.

5 Q. So the only way you used that
6 vehicle was for official PAL business?

7 A. Yes.

8 Q. You said that DC Sullivan isolated
9 you for your complaints. Those are your
10 complaints about the poor condition of the PAL
11 facilities; is that correct?

12 A. It was everything that I would go to
13 him, that was going wrong at PAL. And he would
14 dismiss me, and nothing got resolved. So the
15 unfavorable conditions continued to escalate,
16 and it became a more hostile -- it kept getting
17 more hostile and hostile to the point where Ted
18 Qualli would come into my office and yell at me.
19 He called the sergeants to his office and was
20 influencing their testimony or their interviews
21 at Internal Affairs.

22 Q. How do you know that Ted influenced
23 their testimony within Internal Affairs?

24 A. I didn't say Ted. I said Sullivan,
25 DC Sullivan.

1 E. CINTRON

2 Q. Oh, I'm sorry. So DC Sullivan
3 influenced the sergeant's testimony with --

4 A. He was -- he was controlling the
5 investigation from his office, by telling people
6 not to speak to me, to -- to say stuff that they
7 said that wasn't accurate. And things like
8 that. And after they went to -- after he
9 ordered them to come to his office during the
10 investigation to discuss an investigation, then
11 some of their knowledge of what actually took
12 place, to my surprise, changed when they went to
13 Internal Affairs.

14 Q. What about their testimony changed?

15 A. Well --

16 MR. GREEN: Objection. If you
17 have a specific event that you want
18 her to respond to in connection with
19 that particular question, I think it
20 would be more productive so that the
21 objection now is based on relevancy
22 grounds. If you can be a little bit
23 more specific, perhaps you can be a
24 little bit more informative.

25 MR. GOLDEN: Sure. She said --

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E. CINTRON

and I can have it read back -- that she was -- that the two sergeants changed their -- was it testimony? And so what -- my question to that is what testimony changed? That's -- that's -- she's saying something changed, and what I'm asking is, what specifically -- if she has something specific, what is it that changed?

MR. GREEN: You mean in connection with an investigation at that particular time?

MR. GOLDEN: I don't know. That's what I'm asking --

MR. GREEN: All right.

A. Well, they were misreporting the things that were happening at PAL, after they got called to Sullivan's office.

Q. Can you tell me the things that they were misreporting?

A. They were blatantly lying to the deputy. I had two sergeants there when I first arrived to PAL. And for the most part, they

1 E. CINTRON

2 were both there because of someone they knew on
3 the board. And because of some type of
4 relationship, they -- they were there.

5 The one sergeant was neighbors with Deputy
6 Commissioner Patterson, which was Sergeant
7 Irving. And Sergeant Faust is really good
8 friends with a lot of board members. And the
9 sergeants are inept. Like they don't properly
10 supervise. They are insubordinate. They
11 violate orders. And -- and when I reported all
12 of these incidents to Deputy Commissioner
13 Sullivan, instead of taking remedial actions
14 against the sergeants, he began to utilize them
15 and call them to his office to further his
16 advances to isolate me, by telling Sergeant
17 Pascucci not to speak to me, and to stay away
18 from me, even though I'm Sergeant Pascucci's
19 immediate supervisor.

20 He basically opened up the doors for
21 Sergeant Faust to be blatantly disrespectful and
22 say things like, Oh, nothing is going to happen
23 to me. The commissioner is my buddy, you know.
24 And things like that.

25 I overheard the sergeant talking to Keith

1 E. CINTRON

2 Balcom, who was an officer and who he considers
3 a friend, talk about how him and the deputy were
4 discussing the whole situation, with me being
5 the target of an investigation at Internal
6 Affairs based on some lies. And when I
7 communicated this with DC Sullivan, again, he
8 failed to take action about anything that the
9 sergeant did. When I tried to discipline the
10 sergeant for other infractions, he protected the
11 sergeant and told me not to write him up for
12 anything and to leave him alone.

13 And some of the stuff that I was
14 explaining to the deputy were serious
15 complaints. And the deputy would not take me
16 seriously, and was basically giving Sergeant
17 Faust leeway to be disrespectful and disobey my
18 orders and jump the chain of command. And for
19 someone that I had heard the deputy say that he
20 didn't like, in the past, so it was strange to
21 me that he made a comment in -- at an event,
22 prior to him becoming the deputy of PAL, that he
23 hated Sergeant Faust, but all of a sudden they
24 became friends after Sergeant Faust went to his
25 office, and he was instructing him what to say

1 E. CINTRON

2 at -- during an investigation. He was
3 manipulating the investigation from the third
4 floor.

5 And to the point where when I spoke to
6 Conway, which is the detective conducting the
7 investigation, he -- who had expressed to me
8 that he attempted to close out my case or the
9 allegations against me as false, but that the
10 deputy told him to, keep digging. You got to
11 find something on her. And he attempted to
12 close the case three times, and the deputy
13 wouldn't let him.

14 Q. Who told you that?

15 A. Detective Conway, the investigator.

16 During this conversation, he also told me
17 that he sees a, you know -- I forget the term
18 that he used, but he said he sees a setup --
19 like, he's been doing investigative work for so
20 long that he sees -- that he knows when someone
21 is just trying to, like, find something, even
22 though there's nothing there to find.

23 And he expressed to me, I don't mind going
24 up against a deputy when they are in the wrong.
25 And he's the one that told me to file an EEOC

1 E. CINTRON

2 complaint with the city, and that he would
3 follow up with the investigation.

4 And prior to that, when Sullivan was doing
5 all the stuff that he was doing, I attempted to
6 go to DC Patterson through the chain of command,
7 according to our policy, to report Sullivan.
8 But Sullivan had -- saw me enter the third
9 floor, which is where their offices are at. And
10 as soon as I went into Deputy Commissioner
11 Patterson's office, after setting up an
12 appointment to report Sullivan, Patterson
13 literally was out-talking me and saying, I don't
14 want to hear it, I don't want to hear it. He
15 wants you to go back to him. Referring to
16 Deputy Commissioner Sullivan. And he kept
17 ordering me to shut up and go back to Sullivan.
18 And basically leaving me no recourse to follow
19 the chain of command to report the person who is
20 involved in the cause of their investigation --
21 I mean, the cause of the harassment and
22 discrimination.

23 Q. Did you report your concerns about
24 DC Sullivan to the city's Equal Opportunity
25 office, the EEO office?

1 E. CINTRON

2 A. Yes. Once I exhausted all the ways
3 that I can go about trying to find remedial
4 action to take place within the department, and
5 being ordered by Sullivan not to speak to any of
6 the deputies or to ever speak to the
7 commissioner again, I had no choice but to go to
8 the city, because when Conway told me that I
9 should file one through the department, because
10 Sullivan was already interfering in the current
11 investigation, I didn't trust for the City to
12 handle it and, therefore, I went outside of the
13 department to file my EEOC complaint.

14 Q. So what I -- just so I understand
15 this, if you want to look at Number 2 -- this is
16 the complaint --

17 A. You gave it to me?

18 Q. Yes. Yep. You are looking at it
19 right in front of you. It's -- can you turn to
20 page 9? Yep, you got it. Yep.

21 A. Okay.

22 Q. Page 9, and paragraph 59.

23 A. Yes.

24 Q. And it says that you orally
25 complained to the City's Office of Equal

1 E. CINTRON

2 Employment Opportunity. And so do you recall
3 that complaint?

4 A. That's the conversation I had with
5 Conway. He brought me the forms and told me
6 that he felt that I had enough basis to file an
7 EEO complaint, and asked me, did I want to file
8 one at that time.

9 Q. So Conway gave you the forms that
10 you could --

11 A. Under the deputy commissioner's
12 instruction that was assigned to the Internal
13 Affairs, which was Deputy Commissioner Wimberly.
14 W-I-M-B-E-R-L-Y.

15 Q. And so then am I accurate that you
16 did not complete the form that Conway provided
17 you?

18 A. No.

19 Q. Maybe -- let me ask it -- did you
20 complete that form?

21 A. No.

22 Q. Why is it that you did not complete
23 that form?

24 A. Because Deputy Commissioner Sullivan
25 was already controlling the allegations in the

1 E. CINTRON

2 investigation on me. So I didn't trust for --
3 for a proper investigation to be conducted
4 without his interference.

5 Q. You had mentioned a short time ago,
6 Sergeant Irving, Sergeant Faust, and Sergeant
7 Pascucci.

8 A. Yes.

9 Q. Were those all sergeants operating
10 in the PAL unit?

11 A. Yes.

12 Q. Okay. So I thought you had just
13 maybe -- so when you -- when you became the
14 commanding officer, who were the sergeants at
15 that time?

16 A. Sergeant Irving and Sergeant Faust.

17 Q. And did Sergeant Pascucci replace
18 one of them?

19 A. No. I had requested a third
20 sergeant, and they -- and Deputy Commissioner
21 Patterson approved for me to get a third
22 sergeant.

23 Q. And, again, so as it relates to the
24 appointment of personnel in the PAL unit, that's
25 something that the Deputy Commissioner needs to

1 E. CINTRON

2 approve, or the commissioner?

3 A. Yes. I did a manpower projection
4 and the names of the unit, and we needed a
5 second -- we actually need two sergeants on the
6 street so that one could oversee the east side
7 of the city and the other one could oversee the
8 west side of the city, without being overwhelmed
9 and being able to visit the centers.

10 Q. You mentioned that DC Sullivan
11 influenced what they said during the Internal
12 Affairs investigation. Did either of the
13 sergeants tell you that?

14 A. Yes. Well, I overheard Sergeant
15 Faust's conversation with Keith. And Sergeant
16 Pascucci told me, as soon as he came back from
17 the deputy's office, that the deputy was
18 basically telling him, Watch what you say at
19 Internal Affairs. And told him, you know, We
20 are trying to get Cintron, the lieutenant. And
21 he stated, So stay out of it, and don't talk to
22 her about any of that.

23 Someone that I brought to the unit as the
24 sergeant -- like, I was the one that did his
25 interview and brought to the unit, who I

1 E. CINTRON

2 considered as an ally, because he also
3 experienced everything that was going on at PAL,
4 and he also was having problems with Ted Qualli
5 and Chase Trimmer and the officers, you know,
6 being out of control and problems with the other
7 sergeant, Sergeant Faust.

8 Q. Is Sergeant Pascucci, is that a male
9 or a female?

10 A. Male.

11 Q. And what is his ethnicity?

12 A. White.

13 Q. So a white male was also having
14 problems with people at PAL?

15 A. He was having problems with the
16 staff. With, you know, condescending remarks,
17 you know, civilians versus cops type of
18 mentality. Instead of working together.

19 Q. So that was -- so you're saying the
20 civilian versus the cops, the civilians are the
21 PAL staff, and then the cops are the individuals
22 in your unit; is that correct?

23 A. The officers assigned to PAL, yes.
24 This was something that was going on before I
25 got there. It's, like, the officers felt that

1 E. CINTRON

2 PAL's nonprofit was doing a civilian takeover by
3 replacing them with civilian staff. And they
4 didn't get along with the civilian staff because
5 the civilian staff was taking over their duties
6 that they enjoyed doing. And the civilian staff
7 didn't get along with the officers because the
8 officers, you know, since they report to the
9 police, wouldn't take their request seriously.
10 So it was kind of like a battle between both
11 parties, which is why we needed the Memorandum
12 of Understanding to be in place, so that there
13 could be clear lines as to who is supposed to be
14 doing what.

15 Q. You said that there were battles
16 about who the officers report to, or who the
17 civilians report to?

18 A. Not who they report to. Like, for
19 instance, Ted would tell one of his staff, let's
20 say Chase, I want you to go to Paley PAL and --
21 and implement this program.

22 And the cops didn't like the fact that the
23 civilians would go over there and try to
24 implement programs or take over programs that
25 they were already running, that they enjoyed

1 E. CINTRON

2 doing with the kids, without anybody consulting
3 them or talking to them about it first. So
4 that's where the animosity was coming in, and
5 that was something that was going on that Ted
6 brought to my attention when I first got to PAL.
7 So this was something that was going on way
8 before I got there.

9 Q. Thank you. And then -- but you
10 said -- so it was going on before you got there.
11 And then you and Ted were talking about how it
12 could be --

13 A. How we can get them together, yes.

14 Q. And -- but you said the problem
15 continued to the extent where Sergeant Pascucci
16 also observed the issue?

17 A. Yes. He also had problems with -- I
18 believe he had problems with Chase. He
19 submitted several memos about incidents that
20 happened between the officers and civilians.

21 Q. The -- we have talked today about
22 the complaints that you submitted -- I'm sorry.
23 You were complaining about the conditions of PAL
24 centers and how they were -- you know, some of
25 them were not in good condition. There were

1 E. CINTRON

2 some funding issues. There was a center that
3 wasn't open.

4 Can you tell me, were there any other
5 complaint you recall submitting about how PAL's
6 operations were inadequate, in your opinion?

7 A. Yes. I submitted several memos to
8 the Deputy Commissioner, explaining how Ted and
9 I could not see eye to eye on certain issues
10 pertaining to budget or pertaining to the
11 programs and things of that nature. Like, we
12 would try to handle it internally, but after Ted
13 would receive his, I guess, request from the
14 board as to what they wanted, he was adamant
15 about implementing things the way he wanted it,
16 even though some of those things violated
17 departmental policy, one of which was paying the
18 officers \$25 under the table to work PAL events
19 on the weekend when they were supposed to be
20 off.

21 And when I got there, I was like, this, we
22 cannot do this because the officers have to get
23 paid their right salary, and they have to get
24 paid through the city.

25 When I asked Ted, had they coordinated

1 E. CINTRON

2 payment through police finance, where they have
3 to create an account, they told me they had.
4 But when I called the Police Finance, they told
5 me that nothing was ever filed with them, and
6 therefore, the city had been paying overtime
7 money for PAL events.

8 The one event was in excess of \$8,000. So
9 Patterson had to take from other money to pay --
10 you know, to cover the cost of several events,
11 and he was upset, and he said that PAL has to
12 establish the account with finance so that they
13 can start paying their share of overtime for the
14 police officers. And, in fact, after that, he
15 said that the police was not going to cover any
16 more overtime, any events that the PAL decides
17 to plan on the weekend, knowing that the
18 officers are off on the weekend, and that they
19 are not supposed to be working on the weekend,
20 especially not in uniform while getting paid
21 under the table.

22 Q. So is it safe to say that your
23 disagreements with Ted were about the management
24 of PAL?

25 A. My disagreement was the way they

1 E. CINTRON

2 would handle things like that situation. I was
3 simply informing them, Ted Qualli and the board,
4 that there was a process to having the officers
5 work on the weekend, and the process was to
6 establish an account with police finance so that
7 the officers could get properly paid at their
8 rate of salary, as well as be covered in case
9 something happens, because while they are in
10 uniform, if something happens when they are not
11 supposed to be working, who is going to cover
12 the family of a fallen officer.

13 So those were the issues that I was
14 concerned with. But Ted Qualli and Ron Rabena
15 would insist and continue to schedule these
16 events, you know, when officers weren't working.
17 And that's where the problems came to be.

18 Q. Was there anyone at PAL -- do you
19 recall the date of the last complaint you made
20 to DC Patterson about the issues you were having
21 at PAL?

22 A. DC Patterson had called me up there
23 to -- basically to summarize everything that
24 needed to happen during the transition. And he
25 told me to make sure that I have a sit-down that

1 E. CINTRON

2 he had arranged for me to have with Sullivan, to
3 discuss everything that I had discussed with
4 him, pertaining to PAL, and all the problems and
5 things that I had reported.

6 He also said, I already gave him a
7 heads-up and filled him in, but you can fill in
8 the details. And he set up a meeting for me to
9 sit down with Sullivan when he first began to
10 oversee PAL. So DC Sullivan was well aware of
11 everything that was going on at PAL from the
12 first day.

13 Q. When you submitted the request to
14 separate, was that something you tendered in
15 person or by mail? Do you remember how you --

16 A. No. This is what they make you sign
17 at Internal Affairs. They gave you this
18 paperwork. I did this at my separation or at
19 personnel. I can't remember who I signed this
20 through.

21 Q. But was it in a city office?

22 A. It was at the PAB. It would have
23 been the PAB. I believe this is something I
24 signed either at the PAB or when I went to see
25 the retirement people. I'm not sure where they

1 E. CINTRON

2 had me sign this form.

3 Q. So, forgive me, but for the record,
4 can you explain what PAB means?

5 A. The Police Administration Building.

6 Q. What's the address for that?

7 A. 8th and Race.

8 Q. Thank you.

9 Did you -- when you made the decision to
10 separate from your employment, apart from this
11 form, did you tell anyone else at the city?

12 A. Yes. I went through the process
13 that I had to go through to retire, which meant
14 I had to inform police personnel my intent to
15 leave. I had to inform Deputy Commissioner
16 Sullivan. And they give you a packet that you
17 fill out, and you bring back in two weeks. And
18 by then police personnel makes all the
19 arrangement to begin the process of retirement,
20 such as setting up a meeting with central
21 personnel, setting up for you to discuss
22 compensation that you would get after you leave,
23 with police personnel, and things of that
24 nature; how much you will get for retirement and
25 all of that.

1 E. CINTRON

2 Q. Did you receive any compensation
3 from the city upon your retirement?

4 A. Unfortunately, when I retired, I
5 couldn't receive what I would have received if I
6 stayed the four years drop, or had I finished my
7 career as I intended to do until this happened.
8 And so I only got whatever I had left in the
9 books as far as my vacation time, I think it
10 was.

11 Q. Like, accrued PTO time?

12 A. Yeah, whatever accrued time I still
13 had.

14 Q. And that was provided --

15 A. I think it was -- it wasn't even
16 that. It was -- let me clarify that.

17 I had exhausted all my sick time and
18 vacation during my family leave, so the only
19 thing I got was a partial of that drop money,
20 which was like 30-something thousand dollars.

21 Q. And the drop was paid to you by the
22 city, correct?

23 A. Yes.

24 Q. Do you --

25 A. Had I officially signed up for the

1 E. CINTRON

2 drop and waited four years, it would have been
3 in excess of almost 400,000, which I wasn't
4 planning to do at the time, because I was
5 planning to continue to go up the ranks and stay
6 with the department for a long time to come.

7 Q. Do you receive any -- well, while
8 you were employed with the city, did you
9 contribute to a -- like a delayed benefit, like
10 a pension plan, or did you receive any
11 pension --

12 A. Well, that was the pension money
13 that I received, because I didn't sign up for
14 the drop program, which is a city program where
15 you give them a date that you will retire or
16 leave, and based on -- they average out the time
17 and give you a lump sum when you leave.

18 Q. So if I heard that correctly, that
19 was what you get instead of the pension
20 payments?

21 A. No. You still get your pension
22 check. The drop money, what they call the drop
23 money is something different.

24 Q. And are you receiving anything
25 through that pension?

1 E. CINTRON

2 A. I only get my pension check which is
3 4,900 a month.

4 Q. And that's from the city, correct?

5 A. Which -- yes, which averages out to
6 like 59,60 a year, which is half of the salary I
7 was earning as a lieutenant.

8 Q. And so that's a benefit paid to you
9 by the city, correct?

10 A. Yes.

11 Q. Following your retirement, did you
12 receive anything compensation-wise from PAL?

13 A. No.

14 MR. GOLDEN: It's about 3:30
15 [sic]. Why don't we take a
16 five-minute break. I'm going to try
17 to see what I've got left.

18 THE VIDEOGRAPHER: Time is 4:32.
19 We are now off the record.

20 (A break was taken.)

21 THE VIDEOGRAPHER: The time is
22 4:50. We are now on the record.

23 (Email is received and marked as
24 Exhibit PAL-8 for identification, as
25 of this date.)

1 E. CINTRON

2 Q. Ms. Cintron, we -- Ms. Cintron, I
3 just introduced PAL-8. It's an email that
4 appears to be sent from -- it's an -- appears to
5 be an AOL email address to Greg Doran. Is that
6 an email that you sent to Mr. Doran?

7 A. I sent this email to Mr. Doran as
8 per his request. He specifically told me what
9 he needed in the letter in order to release my
10 commission check, which I never received.

11 Q. So this was a -- it's something that
12 he asked you to send him?

13 A. Specifically as is worded.

14 Q. Okay. So what, did he say it over
15 the phone with you?

16 A. He said, I need to put that, as per
17 our conversation, it will mean that you're
18 resigning and, you know, exactly what's here.
19 He basically told me that he needed that in
20 order for me leave the company in good standing,
21 for me to get my check.

22 Q. And did you say that he still did
23 not give you the check?

24 A. That's correct. I never received my
25 check.

1 E. CINTRON

2 Q. And did you ever follow up with him
3 to find out why it wasn't paid?

4 A. Yeah. He never responded to my
5 calls.

6 Q. Now, earlier, you mentioned that
7 Mr. Doran spoke with DC Coulter; is that
8 correct?

9 A. Yes.

10 Q. Do you know if Mr. Doran spoke with
11 anyone from PAL about you?

12 A. I don't know but -- I guess you guys
13 have this email I sent him.

14 Q. So apart from this email, are you
15 aware of -- just so I'm clear, are you aware of
16 any conversations Mr. Doran had with anyone else
17 from PAL about you?

18 A. No. The only thing I knew was what
19 Jeff told me, which was that he spoke to
20 Coulter.

21 Q. Just so -- I don't know. Do you
22 remember when you last held your position with
23 the city, do you remember what your salary was?

24 A. It was, like, 50-something, 57 --

25 Q. And --

1 E. CINTRON

2 A. -- dollars an hour.

3 Q. Oh, \$57 an hour?

4 A. Yes.

5 Q. And then annualized?

6 A. I was up to like, 115; with
7 overtime, up to 120.

8 Q. Sorry. I asked a poor question.

9 So when you say -- so 57 an hour, and then
10 that would be -- you would work like a 40 -- did
11 you work a 40-hour workweek?

12 A. Yes.

13 Q. And then you would receive, like,
14 overtime?

15 A. Yes.

16 Q. And then did you receive a bonus
17 when you were working for the city?

18 A. No. We don't receive bonuses.

19 Q. And do you know who sets -- let me
20 back up.

21 Did you receive, like, annual increases in
22 your hourly rate as you -- you know, over time?

23 A. Yes. That's based on, like, the
24 years you have on the job, any contractual
25 agreements with the FOP, Fraternal Order of

1 E. CINTRON

2 Police, and basically that's what determines our
3 pay grade.

4 Q. Do you know -- so is it an agreement
5 between the -- forgive me, I don't know the
6 actual name, but is it an agreement between the
7 FOP and the union? Or who is that -- whose --

8 A. No. That isn't how it works. Like,
9 the city has a base pay, depending on your rank,
10 the amount of years. There's a scale that they
11 go by to pay you your salary. But every year
12 the fraternal order of police may negotiate a
13 pay rate, a percentage.

14 Q. Okay. And so that something, the
15 pay rate, is set by the city, correct?

16 A. Yes.

17 Q. When you were the commanding officer
18 of PAL, did PAL have anything to do with how
19 your pay was set?

20 A. No.

21 Q. When you were with the city, do you
22 know, did they maintain a personnel file on you?

23 A. Yes. They maintain a personnel file
24 on everyone.

25 Q. Do you know if PAL maintained a

1 E. CINTRON

2 personnel file on you?

3 A. I don't know.

4 Q. Were there -- in terms of the issues
5 that -- the treatment we talked about today, the
6 problems you've had with the -- you know, the
7 individuals that you've identified, can you
8 recall any other incidents where you felt you
9 were -- leaving aside what we have already
10 talked about, I don't want to ask you that
11 again, but are there any other incidents you
12 recall where you felt you were treated in a
13 discriminatory manner by anyone with PAL, apart
14 from what we have already discussed today?

15 A. That's what I recall as of the
16 moment.

17 Q. Okay.

18 A. Like, right now, to be honest with
19 you, I have a really bad headache, and I'm,
20 like, from my anxiety, I'm getting jittery.

21 MR. GOLDEN: Well, I would put on
22 the record, by an agreement between
23 counsel, we are going to stop for
24 today. I know we have been here
25 for a while. We are going to stop

1 E. CINTRON

2 for today and we have agreed that if
3 we need to continue, the idea will
4 be for us to do it remotely so you
5 would not need to come back in
6 person. And counsel will be
7 coordinating between themselves to
8 set schedules and figure out what
9 other remaining depositions need to
10 be conducted between the parties.
11 Ike, is that a fair --

12 MR. GREEN: That's a fair
13 assessment.

14 MR. GOLDEN: Sharon, does that
15 sound fair to you? We agree to --
16 and we are also going to agree to --
17 we're going to identify dates where
18 witnesses -- availability of counsel
19 and witnesses that we are all
20 looking for so we can get that
21 scheduled and, if need be, go back
22 to the court.

23 MR. GREEN: That's right.

24 MR. GOLDEN: Sharon, is that all
25 right?

MS. ULAK: Yes.

MR. GOLDEN: Okay. And, with that, Ms. Cintron, we are done for today. Thank you very much.

THE WITNESS: Okay. Thank you.

THE VIDEOGRAPHER: The time is 4:57. This now concludes the deposition for today.

(Time noted: 4:57 p.m.)

EVELYN CINTRON

Sworn and subscribed to
before me this ____ day of
_____, _____.

Notary Public

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C E R T I F I C A T I O N

I, CAROLYN C. CRESCIO, a Notary Public, within and for the State of Pennsylvania, do hereby certify that the foregoing witness, EVELYN CINTRON, was duly sworn on the date indicated, and that the foregoing is a true and accurate transcription of my stenographic notes.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of October, 2022.



CAROLYN C. CRESCIO

1 Issac Green, Esquire

2 ikegreen66@gmail.com

3 November 14, 2022

4 RE: Cintron, Evelyn v. City Of Philadelphia Et Al
5 10/28/2022, Evelyn Cintron (#5541591)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-midatlantic@veritext.com

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

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Evelyn Cintron (#5541591)

E R R A T A S H E E T

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REASON_____

Evelyn Cintron

Date

1 Cintron, Evelyn v. City Of Philadelphia Et Al

2 Evelyn Cintron (#5541591)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Evelyn Cintron, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Evelyn Cintron

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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